

EPA Jacket 71355-2

Vol.1

OCT - 8 2004

Olivia Laird
Agent for.
NV CID Lines SA
501 South Lincoln Avenue
Sterling VA 20164-2024

Subject: CID 2000
EPA File Symbol 71355-E
Your Letter from Hill Top Research, Inc. Dated March 12, 2004

In EPA's letter dated August 15, 2003, the Agency indicated that "The amended efficacy data (MRID 459188-01) does not support the use of the product CID 2000 as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (i.e., horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution." The efficacy science review indicated the reason for the denial in section VI (Conclusions): "The laboratory has failed to provide neutralization data demonstrating that Lethen Broth is an effective neutralizer for the product. Neutralization and toxicity evaluation data were provided against *Staphylococcus aureus* but not against *Salmonella choleraesuis*. Otherwise, no growth was observed in the subcultures of the carriers tested against three lots of the product."

In the March 12, 2004 letter from Hill Top Research, Inc. the lab indicated that section 7. Neutralization of DIS/TSS-2 permits companies to either use secondary subcultures or to re-inoculate the test carriers with low levels of the test microorganism to demonstrate neutralization. Hill Top Laboratories elected to conduct secondary subcultures to demonstrate neutralization. Your lab also chose to prove neutralization using an organism completely unrelated to the test organism. The test organism is *Salmonella choleraesuis*, and *Staphylococcus aureus* was used in the subculture test. It is for this reason that the study was rejected. The Agency's interpretation of DIS/TSS-2 does not support the use of an unrelated test organism when demonstrating neutralization.

Following is an excerpt taken from EPA's Series 91: Product Performance Guidelines, Subseries 91A: Public Health Use Antimicrobial Agent Product Performance Test Guidelines:

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

(vii) Neutralization. For each antimicrobial product, procedures must be employed that will preclude residual effects of the active ingredient(s) in the subculture medium. A specific medium capable of neutralizing the antimicrobial effects of a product (whenever one is known) should be employed prior to the microbiological assay. However, evidence must be submitted to demonstrate that the neutralizer employed inactivates the active ingredient(s) and does not possess any antimicrobial activity itself. Some of the recommended methods described in this section rely solely upon the selection of an appropriate subculture medium to neutralize the antimicrobial effects of certain general types of chemical compounds (active ingredients). In lieu of chemical neutralization, it must be documented that appropriate subculture techniques have been employed that preclude residual carryover of active ingredient(s). To document the absence of residual effects of the active ingredient(s) in the subculture medium, **one of the following procedures should be conducted:**

(A) Secondary subcultures must be performed to demonstrate that antimicrobial effects are overcome. **Both the primary cultures and secondary subcultures should be incubated and checked for growth. Results [(+) or (-) growth] for both primary cultures and secondary subcultures should be reported with the test results; or**

(B) At the conclusion of the incubation period specified or employed in the method, the primary culture medium with test carrier must be inoculated with approximately 10 microorganisms/ml of the **specific organism undergoing testing** (this value should be documented by actual plate counts) and re-incubated for the specified period to demonstrate that the subculture media was capable of supporting growth.

To re-iterate, because you did not use the **specific organism undergoing testing in the neutralization** procedure you have failed to provide neutralization data which demonstrates that Lethen Broth is an effective neutralizer for the product. Please refer to the Agency's deficiency letter dated August 15, 2003 to determine what steps need to be taken to continue processing your application.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703) 308-6237.

Sincerely,




Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510C)

Michele Wingfield

10/10/01 11:58 AM

To: Karen Leavy/DC/USEPA/US@EPA

cc:

Subject: Re: Egg Hatching Sanitization claims for labeling (EPA File Symbol Number 71355-E) 

Hatching egg claims are considered FDA regulated drug claims. You should contact Dr. Woodrow Knight at FDA's Center for Veterinary Medicine for additional information. His number is 301-827-0219. If Dr. Knight can't help you, he may be able to direct you to the proper individual.

From an EPA standpoint, the product would need to be a food contact surface sanitizing agent in addition to having the approval from FDA.

Michele
Karen Leavy

Karen Leavy

10/09/01 02:07 PM

To: Michele Wingfield/DC/USEPA/US@EPA, Emily

Mitchell/DC/USEPA/US@EPA, Marshall

Swindell/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA

cc:

Subject: Egg Hatching Sanitization claims for labeling (EPA File Symbol Number 71355-E)

Ladies,

Marshall wanted me to check with you concerning Egg Sanitization claims that appear on this particular product labeling.

Question #1) Does the registrant have to generate Non-food contact sanitization data for the use pattern of the Egg

Sanitization that appears on the product labeling?

Question #2) Does FDA control through regulation this use pattern of the Egg Sanitization claim that appears on the

product labeling?

Your help is greatly appreciated!!!!

KML



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg.
Number:

71355-2

Date of Issuance:

NOV 23 2005

NOTICE OF PESTICIDE:

 X Registration
 Re-registration

Term of Issuance:
CONDITIONAL

Name of Pesticide Product:

Kickstart

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP code):

Cid Lines NV/SA
Waterspoorstraat 2-B 8900 Ieper
Belgium

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/re-registered under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable response; required for re-registration of your product under FIFRA Section 4, or as required by registration review under FIFRA Section 3(g).

2. Make the following labeling changes:

- a. Revise the EPA Registration Number to read,
"EPA Reg. No. 71355-2".
- b. Place the appropriate Establishment No. on the product labeling.

Signature of Approving Official:

Date:

NOV 23 2005

Marshall Swindell, Product Manager, Team 33,
Regulatory Management Branch I, Antimicrobials Division

EPA Form 8570-6

page 2
EPA Reg. No. 71356-2

3. Submit three copies of a final printed production label.


The Confidential Statement of Formula dated October 21st, 2005, is acceptable.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the accepted label is enclosed for your records.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at 703-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division(7510C)

Enclosure

< KICKSTART >

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active Ingredients :	
HYDROGEN PEROXIDE	26.5%
PEROXYACETIC ACID	4.9%
Inert ingredients	68.6 %
	100.0%

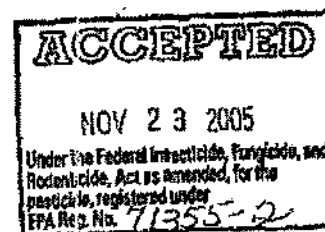
KEEP OUT OF REACH OF CHILDREN

DANGER

KICKSTART is effective against :

Bacteria :	dilution
<i>Staphylococcus aureus</i> (ATCC 6538)	1:200
<i>Salmonella choleraesuis</i> (ATCC 10708)	1:200
<i>Listeria monocytogenes</i> (ATCC 15313)	1:200
<i>Mycoplasma gallinarum</i> (ATCC 19708)	1:200
<i>Salmonella Choleraesuis</i> serotype enteritidis (ATCC 13076)	1:200
<i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :	
<i>Aspergillus fumigatus</i> (ATCC 36607)	1:128
Virus (on environmental surfaces) :	
<i>Infectious Bursal Disease of Chickens</i> (ATCC D78, VR-2041)	1:200
<i>Newcastle Disease</i> (Spafas strain 539016)	1:200
<i>Avian Reovirus</i> (MERIAL SELECT strain 2408)	1:200
<i>Marok's Disease virus</i> (Spafas strain)	1:200

All tests in the presence of 400ppm AOAC hard water and 5% organic load.



FIRST AID STATEMENTS	
IF IN EYES	<ul style="list-style-type: none"> • Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing • Rinse skin immediately with plenty of soap and water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage	

APPLICATION :

In order to disinfect non-food contact surfaces of farm, animal and poultry housing facilities and equipment thoroughly mix one fluid ounce of this product with one and a half gallons of water (1:200). Follow all of the cleaning and application instructions indicated in each of the sections below. In order to effectively kill fungi (i.e., *Aspergillus fumigatus*) you must use 1 fl. oz of this product per one gallon of water dilution (1:128).

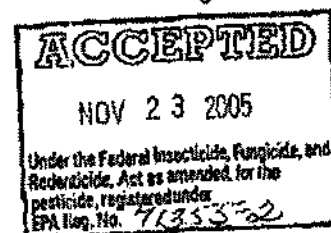
DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, sealed brick walls, sandwich panels and feeding/drinking equipment :

- Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- Fresh disinfecting solution should be made daily.



STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal.

Storage : Never return KICKSTART to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute KICKSTART with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. KICKSTART, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties of merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

Produced by :
CID LINES NV/SA
Waterpoortstraat 2 – B 8900 JEPER
BELGIUM – EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

ACCEPTED

NOV 23 2005

Under the Federal Insecticide, Fungicide, and
Rodenticide Act as amended, for the
pesticide, registered under
EPA Reg. No. 71355-2

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not handle animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (Including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors or spray mist. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

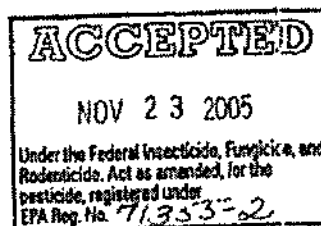
Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. KICKSTART is not combustible; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.



Laird's Regulatory Consultants, Inc

Over 32 years Experience and Expertise in The Regulation of Pesticide Products

September 9, 2005

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management I
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: KICKSTART
EPA FILE SYMBOL 71355-E
Revised labeling per our phone conversation
Karen Leavy reviewer

Dear Mr. Swindell:

Please find attached hereto, five (5) copies of the revised label for the product label referenced above. Per our conversation, we have removed the reference to E. Coli until the lab has made a correction to the data pertaining to this organism. We have also changed the ATCC Number for Salmonella Cholerasuis to 10708 per your request.

Thank you for your assistance in this process.

Should you have additional questions or concerns please don't hesitate to let me know as soon as possible.

Sincerely,



Olivia D. Laird
President/Agent

degussa.

Vincent Catry
Cid Lines NV
Waterpoortstraat 2
B-8800 Ieper
Belgium

Degussa Corporation
379 Interpace Parkway
P.O. Box 677
Parsippany, NJ 07054-0677

Direct: (973) 541-8053
Fax: (973) 541-8040

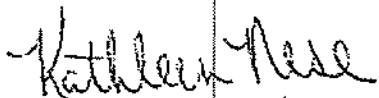
Kathleen.Nese@degussa.com
www.degussa.com

Dear Mr. Catry,

Degussa Corporation has received your request to be allowed to cite Product Chemistry data used by Degussa in the FIFRA registration of Peraclean 5. The number assigned to the report in which this data is contained is MRID 44506501. Degussa Corporation does not seek any compensation for your use of this data.

I recommend that you include a copy of this letter with your product registration documentation and associate this document with your data matrix, EPA Form 8570-35.

Best regards,



Kathleen Nese
Manager of Product Safety
Degussa Corporation - Product Regulatory Services



Michael Lew
Product Manager
Degussa Corporation - Bleaching and Water Chemicals

DECISION PKG. NO. 216261SUBM. DUE DATE 10-08-05SUBMISSION BAR CODE # 780234REVIEWER K Leary-MunkCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 188DESCRIPTOR Add, Use, New Reg. FOPA NFOPA ☐ CHILD RESISTANT PACKAGING: ☐ REQUIRED ☐ NOT REQUIREDREGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONAL ☐ RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

06/10/0506/10/0506/14/05

METHOD OF SUPPORT

FORMULATORS EXEMPTION

☐ CITE-ALL☐ SELECTIVE☐ SUBMITTED☐ NOT SUBMITTED☐ NOT SUBMITTED☐ N/A☐ B/A

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY

EFFICACY

ACUTE TOX.

RASSE TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER:

STATUS

RESPONSE CODE 1-3RESPONSE DATE SEP 20 2005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 20 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Olivia Laird
CID Lines NV/SA
Waterpoorstraat 2-B 8900 Ieper
Belgium

Mail to: Laird's Regulatory Consultants, Inc.
Shenstone Estates
17804 Breamar Place
Leesburg, VA 201780-7046

Subject: Kickstart
EPA File Symbol Number 71355-E
Your Application June 10th, 2005
EPA Received Date June 10th, 2005

The following application, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable for the following reasons:

EFFICACY

As per our letter of June 23rd, 2005, neutralization data has not been submitted for the organism, *Escherichia coli*. Delete the claim for *E. coli* from the product labeling OR Provide the neutralization data for our review and acceptance.

Please note: This data must be submitted before the claim can be accepted.

However, the submitted data (MRID # 465694-01) were adequate to support AOAC Letheen Broth as a neutralizer when used against Kickstart at a dilution of 1:256 for *Salmonella choleraesuis*.

Please note: The data has been found to be acceptable at this time; however, it is not the standard method of neutralization that is performed in the AOAC use dilution test wherein 10 organisms/mL are added to the post neutralized sample and observed for growth.

LABELING

The proposed label claims that the product, Kickstart, is an effective disinfectant against *Salmonella choleraesuis* at a dilution of 1:256 and a contact time of 10 minutes. This claim is acceptable based on previously and currently submitted data (MRIDs 465694-01 and 459188-01).

Please note: In the future, the laboratory must conduct neutralizer effectiveness testing as described in the AOAC Use Dilution Test, wherein, 10 organisms/mL are added to a post neutralized test sample instead of an inoculated carrier.

The proposed label claims that the product, Kickstart, is an effective disinfectant against *Salmonella choleraesuis* at a dilution of 1:256 dilution and a contact time of 10 minutes. Neutralization data must be submitted before this claim can be accepted.

A copy of the review is enclosed for your review.

The Agency reserves a full label review until the above discrepancies have been clarified.

The product may not be lawfully distributed in interstate commerce until the above discrepancies have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

Environmental Protective Agency
Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division
Washington DC 20460

leper, May 31, 2005

Subject : KICKSTART - CID 2000
EPA File symbol n° : 71355-E

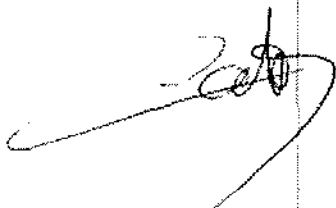
Dear Mr. Swindell,

In reply to your letter, dated Jan 13, 2005 and your letter, dated Oct 8, 2004 ,
we hereby supply supplemental neutralizer and toxicity control data for efficacy
against Salmonella Cholerauis.

The amended efficacy data (MRID No. 459188-01) was not accepted for
reasons of lack of neutralizer control on Salmonella Cholerasis.
With this report we wish to provide this supplemental data. Additionally, we
have also amended the label with an efficacy claim against this organism,
together with the broad spectrum claim on top of the label.

Yours Sincerely,

Vincent Catry
Regulatory Affairs



DATA PACKAGE BEAN SHEET

Date: 04-Aug-2005

Page 1 of 1

***** Registration Information *****

Registration: 71355-E - CID 2000

Company: 71355 - CID LINES N.V.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 14-Jun-2005

Calculated Due Date: 08-Oct-2005

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (188) ADDITIONAL USE;NEW REGISTRATION;OLD INGREDIENT;ME-TOO

Ingredients: 000595. Hydrogen peroxide(20%)

***** Data Package Information *****Expedite: Yes ☒ No

Date Sent: 21-Jun-2005

Due Back: _____

DP Ingredient: 000595. Hydrogen peroxide

DP Title: _____

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

24-Jun-2005

8/6/05 Last Possible Science Due Date: 05-Jul-2005

Team Name: EET

24-Jun-2005

04-Aug-2005

Science Due Date: 08-Sep-2005

Reviewer Name: Wawzysko, Marcie

27-Jun-2005

29-Jul-2005

Sub-Data Package Due Date: 24-Aug-2005

Contractor Name: _____

***** Studies Sent for Review ********** Additional Data Package for this Decision ********** Data Package Instructions *****

PLEASE REVIEW THE EFFICACY STUDY ENTITLED, "NEUTRALIZER EFFECTIVENESS AND EVALUATION FOR AOAC USE-DILUTION METHOD(MRID NO.465694-01); PROPOSED LABELING AND LAST STAMPED LABEL IS ENCLOSED;FQPA, ACTION CODE 188, EET, 9-18-05, ADMIN DUE DATE 10-08-05

DATA PACKAGE BEAN SHEET

Date: 21-Jun-2005

Page 1 of 1

***** Registration Information *****

Registration: 71355-E - CID 2000

Company: 71355 - CID LINES N.V.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 14-Jun-2005

Calculated Due Date: 08-Oct-2005

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (188) ADDITIONAL USE;NEW REGISTRATION;OLD INGREDIENT;ME-TOO;

Ingredients: 000595, Hydrogen peroxide(20%)

***** Data Package Information *****Expedite: ☐ Yes ☒ No

Date Sent: 21-Jun-2005

Due Back: _____

DP Ingredient: 000595, Hydrogen peroxide

DP Title: _____

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

6/24/05

Last Possible Science Due Date: 05-Jul-2005

Team Name: EET

6/24/05

Science Due Date: 9/8/05

Reviewer Name: Marcie

7/3/05
7/29/05

Sub-Data Package Due Date: 8/24/05

Contractor Name: _____

***** Studies Sent for Review ********** Additional Data Package for this Decision ********** Data Package Instructions *****

PLEASE REVIEW THE EFFICACY STUDY ENTITLED, "NEUTRALIZER EFFECTIVENESS AND EVALUATION FOR AOAC USE-DILUTION METHOD(MRID NO.465694-01); PROPOSED LABELING [REDACTED] IS ENCLOSED; FQPA, ACTION CODE 188, EET, 9-18-05, ADMIN DUE DATE 10-08-05



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 29, 2005

MEMORANDUM

Subject: Efficacy Review for Kickstart, EPA Reg. No. 71355-E;
DP Barcode: D318421

From: Marcie Wawzysko Tidd, Microbiologist *Marcie Tidd*
Product Science Branch *July 29, 2005*
Antimicrobials Division (7510C)

Thru: Nancy Whyte, Acting Team Leader *Nancy Whyte*
Product Science Branch *August 4, 2005*
Antimicrobials Division (7510C)

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

To: Marshall Swindell PM 33 / Karen Leavy-Munk
Regulatory Management Branch I
Antimicrobials Division (7510C)

Applicant: CID LINES NV/SA
Waterpoortstraat 2
B 8900 IEPER
Belgium, Europe

Formulation from the Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen Peroxide.....	26.5%
Peroxyacetic Acid.....	4.9%
<u>Other ingredients</u>	68.6%
Total.....	100.0%

I. BACKGROUND

The product, Kickstart® (EPA Reg. No. 71355-E) is a new product developed by CID LINES N.V. for use as a broad spectrum disinfectant (bactericide, virucide, fungicide). The applicant is submitting additional data in response to requests made in Agency letters dated January 13, 2005 and October 8, 2004. The submitted study was conducted by Hill Top Research, Inc., located at Main & Mill Streets in Miamiville, Ohio 45157.

The data package contained a letter from the applicant to the Agency (dated May 31, 2005), one study (MRID No. 465694-01) with Statements of No Data Confidentiality Claims and Compliance with GLP, and the proposed product label.

II. USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces on farm equipment, animal housing buildings, floors, walls, pens, stalls, chutes, cages, feeding/drinking equipment, handling/restraining equipment, vehicles, hatcheries, setters, trays, racks, carts, tables, chick boxes, and animal cages. The product may be used on hard, non-porous surfaces such as steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, and sealed brick walls.

Directions on the proposed label provide the following information regarding preparation and use of the product as a disinfectant on farm equipment and animal housing buildings: Thoroughly clean surfaces with soap or detergent. Rinse with water. Saturate surfaces with disinfection solution using spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Rinse feeding and watering appliances with potable water before reuse.

The proposed label also includes directions for the disinfection of hatcheries, food processing plants, and trucks and other vehicles.

III. AGENCY STANDARDS FOR PROPOSED CLAIMS

Disinfectants for Use on Hard Surfaces in Hospital or Medical Environments

The effectiveness of disinfectants for use on hard surfaces in hospital or medical environments must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). The tests require that sixty carriers must be tested with each of 3 samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* ATCC 10708 (for effectiveness against Gram-negative bacteria), *Staphylococcus aureus* ATCC 6538 (for effectiveness against Gram-positive bacteria), and *Pseudomonas aeruginosa* ATCC 15442 (representative of a nosocomial pathogen). [180 carriers per sample; a total of 540 carriers] To pass performance requirements, tests must result in killing in 59 out of each set of 60 carriers to give a 95% confidence level. These agency standards can be found in DIS/TSS-1.

Supplemental Recommendations: Neutralization

For each antimicrobial product, procedures must be employed that will preclude residual effects of the active ingredient(s) in the subculture medium. A specific medium capable of neutralizing the antimicrobial effects of a product should be employed prior to the microbiological assay. Some of the Recommended Methods rely solely upon the selection of an appropriate subculture medium to neutralize the antimicrobial effects of certain general types of chemical compounds (active ingredients). However, to document absence of residual effects of the active ingredient(s) in the subculture medium, the following testing is necessary: (i) secondary subcultures must be performed to demonstrate that antimicrobial effects were overcome, or (ii) at the conclusion of the incubation period specified or employed in the method, the primary culture medium with test carrier must be inoculated with approximately 10 microorganisms/ml of the specific culture under test (documented by actual plate counts) and re-incubated for the specified period to demonstrate that the subculture medium was capable of supporting bacterial growth.

IV. SUMMARY OF SUBMITTED STUDIES

MRID 465694-01 "Neutralizer Effectiveness and Toxicity Evaluation of AOAC Use-Dilution Method for Kickstart" by Kathleen A. Baxter. Study conducted by Hill Top Research, Inc., HTR Study Number 04-123608-106. Study completed May 27, 2005.

This study was conducted to determine the effectiveness of a neutralizer to inactivate the test agent and to determine the lack of toxicity of the neutralizer to the test system. One lot (Lot No. 405073) of the product was tested, and AOAC Letheen Broth was used as the neutralizing agent. One sterile stainless steel carrier was exposed to a 1:256 dilution of the test substance for 10 minutes at $20 \pm 1^\circ\text{C}$. Another carrier was inoculated with a 48-54 hour old culture of *Salmonella choleraesuis* (ATCC 10708) and exposed to 10mL of sterile purified water for 10 minutes at $20 \pm 1^\circ\text{C}$. After exposure, the carriers were transferred to a single tube of 10 mL neutralizer medium and mixed. After 30 minutes, both carriers were transferred to secondary subculture tubes of 10 mL neutralizer. All tubes were incubated for 48 hours at $37 \pm 2^\circ\text{C}$ and examined for the presence or absence of growth.

V. RESULTS

Growth was seen in both primary and secondary subculture tubes for both replicates.

VI. CONCLUSIONS

The submitted data (MRID 465694-01) were adequate to support AOAC Letheen Broth as a neutralizer when used against Kickstart® at a dilution of 1:256 for *Salmonella choleraesuis*. This data is supplemental to an earlier study (MRID 459188-01) in which the AOAC use dilution test was performed against this organism without determination of neutralizer effectiveness.

****Please note:** The Agency will accept this data at this time; however it is not the standard method of neutralization that is performed in the AOAC use dilution test wherein 10 organisms/mL are added to the post neutralized sample and observed for growth. The method used in this study, involving an inoculated carrier added to neutralizer broth containing a sterile, treated carrier is unorthodox. This procedure will add an extremely high number of organisms to the neutralizer broth, causing uncertainty in the resulting cultures as to whether actual growth is seen, or if the turbidity is due solely to the high number of organisms removed from the carrier surface.

VII. RECOMMENDATIONS

1. The proposed label claims that the product, Kickstart®, is an effective disinfectant against *Salmonella choleraesuis* at a dilution of 1:256 and a contact time of 10 minutes. This claim is acceptable based on previously and currently submitted data (MRIDS 465694-01 and 459188-01).

***Note:** In the future the laboratory must conduct neutralizer effectiveness testing as described in the AOAC Use Dilution Test, wherein 10 organisms/mL are added to a post neutralized test sample instead of an inoculated carrier, for reasons explained above.

2. The proposed label claims that the product, Kickstart®, is an effective disinfectant against *Escherichia coli* at a 1:256 dilution and a contact time of 10 minutes. As discussed in the June 23, 2005 letter from the Agency, neutralization data has not been submitted for this organism. The applicant must submit such data before this claim is acceptable.

KICKSTART®

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active Ingredients :	
HYDROGEN PEROXIDE	26.5%
PEROXYACETIC ACID	4.9%
Inert ingredients	68.6 %
	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

CID 2000 is effective against :

Bacteria :	dilution
✓ <i>Staphylococcus aureus</i> (ATCC 6538)	1:256
✓ <i>Salmonella choleraesuis</i> (ATCC 10718) ND	1:256
✓ <i>Escherichia coli</i> (ATCC 11229) ND	1:256
✓ <i>Listeria monocytogenes</i> (ATCC 15313)	1:512
✓ <i>Mycoplasma gallinarum</i> (ATCC 19708)	1:512
✓ <i>Salmonella Choleraesuis</i> serotype enteritidis (ATCC 13076)	1:512
✓ <i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :	
✓ <i>Aspergillus fumigatus</i> (ATCC 36607)	1:128
Virus (on environmental surfaces) :	
✓ <i>Infectious Bursal Disease of Chickens</i> (ATCC D78, VR-2041)	1:384
✓ <i>Newcastle Disease</i> (Spafas strain 539016)	1:384
✓ <i>Avian Reovirus</i> (MERIAL SELECT strain 2408)	1:384
✓ <i>Marek's Disease virus</i> (Spafas strain)	1:384

All tests in the presence of 400ppm AOAC hard water and 5% organic load.

FIRST AID STATEMENTS	
IF IN EYES	<ul style="list-style-type: none"> Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage	

EPA Reg. N° : 71355-

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

Produced by :
 CID LINES NV/SA
 Waterpoortstraat 2 – B 8900 IEPER
 BELGIUM – EUROPE
 Phone : 011 32 57 217877
 Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. KICKSTART is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, sealed brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.



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Phone : 011 32 57 217877
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2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (Including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product

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SUPM. DUE DATE 06-25-05

REVIEWER K. Lepg-Munk

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTS

FILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 188

DESCRIPTOR: Additional Use FOPA NFOPA

☐ CHILD RESISTANT PACKAGING: ☐ REQUIRED ☐ NOT REQUIRED

REGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONAL ☐ RESTRICTED USE

FM RECEIVE DATE

13102105

FORMULATORS EXEMPTION

[] CITE-ALL	[] SELECTIVE	[] SUBMITTED	[] NOT SUBMITTED
[] NOT SUBMITTED	[] N/A	[] N/A	

[illegible]

CHEMISTRY

EFFICACY

ACUTE TOX. _____] [_____] [_____] [_____]

RASSB TOX. _____] [_____] [_____] [_____]

ENVIRON. FATE] [] [] []

FISH/WILDLIFE] [_____] [_____] [_____] [_____]

OTHER: _____) (_____) (_____) (_____)

STATUS

JUN 23 2005

RESPONSE CODE 1-3

RESPONSE DATE _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 23 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Olivia Laird
CID Lines NV/SA
Waterpoortstraat 2-B 8900 Ieper
Belgium

Mail to: Laird's Regulatory Consultants, Inc.
Shenstone Estates
17804 Braemar Place
Leesburg, VA 20178-7046

Subject: Kickstart
EPA File Symbol 71355-E
Your Application Dated February 23rd, 2005
EPA Received Date March 2nd, 2005

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act(FIFRA), as amended, is unacceptable for the following for the following reasons:

EFFICACY

The submitted efficacy data(MRID No. 464805-01) do not currently support the use of the product, Kickstart, as a disinfectant with bactericidal activity against *Escherichia coli* on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load (horse serum) for a contact time of 10 minutes at a 1:256 dilution. Provide the results of neutralizer effectiveness testing, which was apparently conducted under study assigned Hill Top Research Study No. 01-109138-106.

The submitted efficacy data (MRID No. 464805-01) do not support the use of the product, Kickstart, as a fungicide against *Aspergillus fumigatis* (ATCC 10894) on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load(horse serum) for a contact time of 10 minutes at a 1:256 dilution.

However, the submitted efficacy study (MRID No. 464805-03) supports the use of the product, Kickstart, as a disinfectant with fungicidal activity against *Aspergillus fumigatis*(ATCC 36607) on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load (heat inactivated fetal bovine serum) for a contact time of 10 minutes at a 1:128 dilution. No growth was observed when the product was tested against two lots of the product. Viability controls were positive for growth. Sterility controls did not show growth. Fungistatic streaks exhibited no growth.

The submitted efficacy data support the use of the product, Kickstart, as a disinfectant with virucidal activity against the following microorganisms on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load for a contact time of 10 minutes at a 1:384 dilution:

Avian Reovirus	MRID No. 464805-04
Marek's disease virus	MRID No. 464805-02
Newcastle disease virus	MRID No. 464805-05

Complete inactivation (no growth) was indicated in all dilutions tested. Cytotoxicity was not observed. Recoverable virus titers of at least 10^4 were achieved.

LABELING

The proposed label claims that the product, Kickstart, is an effective disinfectant against *Escheria coli* on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load for a contact time of 10 minutes, is unacceptable. The submitted data do not currently support this claim. Delete the following efficacy claim from the product labeling or provide the results of the neutralizer effectiveness testing in order to support this efficacy claim.

The proposed label claims that the product, Kickstart, is an effective against the following microorganisms on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic load for a contact time of 10 minutes when used at the dilutions specified;

<i>Aspergillus fumigatis</i> (ATCC 36607)	1:128 dilution
Avian Reovirus (MERIAL SELECT strain 2408)	1:384 dilution
Marek's disease virus(Spafar strain)	1:384 dilution
Newcastle disease virus(Sparas strain)	1:384 dilution

The proposed label also includes claims of effectiveness against the following microorganisms:

Staphylococcus aureus(ATCC 6538)
Listeria monocytogenes(ATCC 15313)
Mycoplasma gallinarum(ATCC 19708)
Salmonella choleraesuis serotype enteritidis (ATCC 13076)
Pseudomonas aeruginosa(ATCC 15442)
Infectious Bursal Disease of Chickens(ATCC D78,VR-2041)

The submitted data do not currently support this claim. Delete the following efficacy claims from the product labeling or provide data to support these efficacy claims to the Agency of our review.

Make the following revisions to the proposed labeling, as follows:

On page 1, change "Salmonella chloesuis" to read "Salmonella choleraesuis."

On page 3, change "Procedures for leak for spill" to read "Procedures for leak or spill".

On page 3, change "regulatory agencies should be contacted by prior to disposal" to read "regulatory agencies should be contacted prior to disposal".

On page 3, change "Kickstart which is discharged, should be disposed....." to read "Dispose of Kickstart.....".

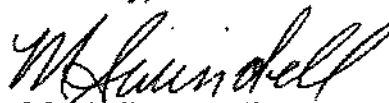
A copy of the review is enclosed for your records.

The Agency reserves a full review until the above discrepancies have been clarified.

The product may not be lawfully distributed in interstate commerce until the above discrepancies have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703) 308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

DATA PACKAGE BEAN SHEET

Date: 20-May-2005

Page 1 of 1

***** Registration Information *****

Registration: 71355-E - CID-2005

(Kickstart)

Company: 71355 - CID LINES N.V.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 02-Mar-2005

Calculated Due Date: 25-Jun-2005

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (188) ADDITIONAL USE;NEW REGISTRATION;OLD INGREDIENT;ME-TDO;

Ingredients: 000595, Hydrogen peroxide(20%)

***** Data Package Information *****Expedite: Yes ☒ No

Date Sent: 09-Mar-2005

Due Back:

DP Ingredient: 000595, Hydrogen peroxide

DP Title:

CSF Included: ☒ Yes NoLabel Included: ☒ Yes No

Parent DP #:

Assigned To

Date In

Date Out

Organization: AD / PSB

11-Mar-2005

Last Possible Science Due Date: 16-Jun-2005

Team Name: EET

11-Mar-2005

20-May-2005

Science Due Date: 25-May-2005

Reviewer Name: Whyte, Nancy

11-Mar-2005

19-May-2005

Sub-Data Package Due Date: 11-May-2005

Contractor Name: DynCorp

15-Mar-2005

***** Studies Sent for Review ********** Additional Data Package for this Decision ********** Data Package Instructions *****

Resubmitted additional efficacy studies for review; MRID Nos. 46480501, 46480502, 46480503, 46480504, 46480505; label and CSF included with this data package.

Action Code 188, Admin Due Date 06/25/05, EET Due Date 05/25/05, FQPA

DP Sequence: 314158 Expedite: ☐ Yes ☒ No Label: ☒ Yes ☐ No CSF: ☒ Yes ☐ No

Unlock Data Pkg

Review Sheet

Bean Count: 1

Data Package Title:

Parent DP #:

Data Package Type:

Instructions: Resubmitted additional efficacy studies for review; MRID Nos. 46480501, 46480502, 46480503, 46480504, 46480505, label and CSF included with this data package.
Action Code 188, Adm'n Due Date 06/25/05, EET Due Date 05/25/05, FGPA

☒ Sent To ☒ Sent From ☒ DP Dates ☒ MRIDS ☒ Sub-DP ☒ DP Ingredients ☐ DP Contract ☒ Receipts☒ Data Package Comments ☐ Waiver Documentation

Comment

Numerous organism have acceptable data for effectiveness as disinfectant. Data to support label claim for *E. coli* unacceptable due to lack of neutralizer testing data. *Aspergillus* data acceptable only if dilution of 1:28 is used. Label needs minor corrections.



OPPIN Login

EPA-OPPIN Main - Con...



10:15 AM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 2, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CID LINES N.V.
SHENSTONE EST. 17804 BRAEMAR PL
LEESBURG, VA 21076-7046

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 25-FEB-05. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 775110

Regulatory Type: Product Registration - Section 3

Application Type: Pending Product Amendment

Company: 71355 CID LINES N.V.

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 71355-E

Product Name: CID 2000

Overrides:

Me Too Section 3:

Me Too Product Name:

Application Date: 23-Feb-2005

OPP Rec'd Date: 25-Feb-2005

Front End Date: 02-Mar-2005

Risk Manager Send Date: 02-Mar-2005

Fast Track:

Review Ingredient:

Receipt Description: additional efficacy data

Form A:

Signature Date:

Form B:

Signature Date:

Print Letter

Enter More Information

Receipt Content: Study

Review Ingredient Request Date:

Review Ingredient Referred Date:

Laird's Regulatory Consultants, Inc

Over 32 years Experience and Expertise in The Regulation of Pesticide Products

February 22, 2005

464805-00

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management I
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: CID 2000
EPA FILE SYMBOL 71355-E
Your letter dated January 13, 2005

Dear Mr. Swindell:

Please find attached hereto, per my conversation with Ms. Leavy-Munk, concerning the product name change from CID 2000 KICKSTART. This is being done in an attempt to eliminate further questions or concerns about the name of the product as it is associated with the date being submitted.

The original application was submitted under the name of CID 2000 but during the process the company decided that they want the name KICKSTART so all data belongs to the same product. So I would like to request that the name be officially changed to KICKSTART as a part of the records for this registration.

Also attached hereto is 5 volumes of efficacy data to address the data requirements specified in the letter referenced above.

Should you have questions or concerns please don't hesitate to let me know.

Sincerely,


Olivia D. Laird
President/Owner/Agent

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter and Sponsor

SUBMITTER

Laird's Regulatory Consultants, Inc.
17804 Braemar Place
Leesburg, VA 20175

SPONSOR

Mr. Vincent Catry
NV Cid Lines
Waterpoortstaat 2
8900 Ieper Belgium

2. Regulatory Action to Be Taken

Resubmission of additional efficacy data to support claims

EPA File Symbol/ Reg. No.: 71355-E

Product Name: KICKSTART old name CID 2000

Transmittal Date

February 23, 2005

3. List of Submitted Studies

Volume 1: Administrative Materials

46480501 Volume 2: Efficacy Data- AOAC Use Dilution Method, Fungicidal Modification

46480502 Volume 3: Efficacy Data- Virucidal Effectiveness (Marek's disease virus)

46480503 Volume 4: Efficacy Data- Virucidal Efficacy Test (Aspergillus Fumigatus)

46480504 Volume 5: Efficacy Data- Virucidal Evaluation of KICKSTART AGAINST
Avian Reovirus in a suspension Assay

46480505 Volume 6: Efficacy Data- Virucidal Evaluation of KICKSTART for use on
Inanimate Environmental Surfaces against Newcastle Disease Virus

Company Official:  for Vincent Catry
Olivia D. Laird

Company Contact: Olivia D. Laird
Phone: (703) 669-0509
Fax: (703) 669-4608

VOLUME 1 OF 6

Summary Information For Study 45767001

MRID: 45767001

Citation Reference: Bowdon, H. (2002) Virucidal Evaluation of Kick-Start For Use on Inanimate Environmental Surfaces: Test for Efficacy Against Infectious Bursal Disease Virus: Lab Project Number: 01-7: 35. Unpublished study prepared by Southern Microbiology Associates, LLC. 11 p.

Author: Bowdon, H.

Content Category: Complete primary report -- experimental research

Receipt Date: 01-Oct-2002

Laboratory Project #: 01/7

Accession #: 457670 01

Products Tested:

Status:

DP #:

Ingredients

PC Code	CAS #	Ingredient Name
000595	7722-84-1	Hydrogen peroxide
Total Rows: 1		

Laboratory

Laboratory #	Laboratory Name
71355	CID LINES N.V.
954232	Southern Microbiology Associates, LLC
Total Rows: 2	

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Last updated on February 4, 2004, Version 1.4
<http://dcoppbod01:7777/pls/oppina9p>

Results

4 Items Found

MRID

- 1) [45767001](#)
- 2) [45767002](#)
- 3) [45767003](#)
- 4) [46364201](#)



U.S. Environmental Protection Agency
Office of Pesticide Programs Information Network



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SUMMARY REPORTS

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KICKSTART-

New Product Name

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :
HYDROGEN PEROXIDE
PEROXYACETIC ACID
Inert ingredients

26.5%
4.9%
68.6 %
100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Kickstart is effective against :

Bacteria :		dilution
4 5767002	<i>Staphylococcus aureus</i> (ATCC 6538) MA ✓	1:256
Pend	<i>Escherichia coli</i> (ATCC 11229)	1:256
45767003	<i>Listeria monocytogenes</i> (ATCC 15313) MA	1:512
45767003	<i>Mycoplasma gallinarum</i> (ATCC 19708) MA	1:512
45767003	<i>Salmonella Chikareasuis serotype enteritidis</i> (ATCC 13076) NO	1:512
416364201	<i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :		
Pend	<i>Aspergillus fumigatis</i> (ATCC 36607)	1:128
Virus (on environmental surfaces) :		
45767001	<i>Infectious Bursal Disease of Chickens</i> (ATCC D78,VR-2041) MA	1:384
Pend	<i>Newcastle Disease</i> (Spafas strain 539016)	1:384
Pend	<i>Avian Reovirus</i> (MERIAL SELECT strain 2408)	1:384
Pend	<i>Marek's Disease virus</i> (Spafas strain)	1:384

All tests in the presence of 400ppm AOAC hard water and 5% organic load.

FIRST AID STATEMENTS

IF IN EYES	<ul style="list-style-type: none"> Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage	

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

Produced by :
CID LINES NV/SA
Waterpoortstraat 2 – B 8900 IEPER
BELGIUM – EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. **Kickstart** is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.



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2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return Kickstart to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute Kickstart with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. Kickstart which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active Ingredients :
HYDROGEN PEROXIDE
PEROXYACETIC ACID
Inert ingredients

26.5%
4.9%
68.6 %
100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

CID 2000 is effective against :

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<i>Mycoplasma gallinarum</i> (ATCC 19708)	1:512
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All tests in the presence of 400ppm AOAC hard water and 5% organic load.

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Probable mucosal damage may contraindicate the use of gastric lavage

EPA Reg. N° : 71355-

NET CONTENTS : 1 - 5 gallon(s)

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EPA Est. N° : 71355-BEL-001

EXPIRY DATE :

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- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of bams, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.

CID LINES
INNOVATIVE PESTICIDE SOLUTIONS

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4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

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Waterpoortstraat 2 - B 8900 IEPER
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES
Antimicrobials Division

May 19, 2005

MEMORANDUM:

EPA Reg. No 71355-E *Kickstart* (formerly CID 2000)
DP 314158

From: Nancy Whyte, Efficacy Team Leader (Acting)
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

Nancy Whyte
May 19, 2005

To: Marshall Swindell/Karen Leavy-Munk
Team 33, RMB I

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

Registrant: CID Lines NV/SSA
Waterpoorstaat 2-B 8900
Ieper, Belgium

Formulation Label:	<u>% by wt.</u>
<u>Active Ingredient(s)</u>	
Hydrogen Peroxide.....	26.5%
Peroxyacetic acid.....	4.9%
Other ingredients.....	68.6%%
Total.....	100.0%

I. Background:

The product, *Kickstart* (EPA File Symbol 71355-E), is a new product. The applicant has submitted an application to register the product as a disinfectant (bactericide, fungicide, virucide) for use on hard, non-porous surfaces in commercial and animal care environments. The data package contains efficacy data submitted by the applicant to address requirements specified in an EPA letter, dated January 13, 2005. [A copy of this EPA letter was not included in the data package.] The label claims that the product is effective in the presence of 400 ppm hard water and a 5% organic soil load. Studies were conducted at MicroBioTest, Inc., located at 105B Carpenter Drive in Sterling, VA 20164; Southern Microbiology Associates, LLC, located

at 4204 Edmonton Dr., Bessemer, AL, 35022; and Hill Top Research, Inc., located at Main & Mill Streets, Miamiville, OH 45147.

This data package contained a letter from the applicant's representative to EPA (dated February 22, 2005), EPA Form 8570-4 (Confidential Statement of Formula), five studies (MRID Nos. 464805-01 through 464805-05), Statements of No Data Confidentiality Claims for all five studies, and the proposed label. This submission contained efficacy data which was requested by the Agency in 2004 as part of a Data Call-in (DCI) for the re-registration of products which contain mineral acids as an active ingredient. This product also contains iodine as an active ingredient. The efficacy data submitted was collected in 1981, and is not applicable at this time for re-registration. Since the submission of the efficacy data, the product registration has been cancelled.

II. Use Directions:

The product is designed to be used for disinfecting hard, non-food, non-porous surfaces such as animal housing facilities and equipment, trucks and vehicles, glazed tiles, sandwich panels, and feeding/drinking equipment. The product may be used on hard surfaces made of aluminum, copper, steel (i.e., stainless, galvanized, painted), finished wood, vinyl, and plastics. Directions on the proposed label provided the following information regarding preparation and use of the product as a disinfectant: Prepare use solution by mixing an appropriate amount of the product with water (1:128 to treat against *Aspergillus fumigatis*; 1:256 to treat against *Escherichia coli*; and 1:384 to treat against viruses). Thoroughly clean all surfaces with soap or detergent. Rinse with water. Saturate all surfaces with the use solution by using a spray, mop, or sponge, or by immersion. Surfaces must remain wet for 10 minutes. Scrub feeding and water appliances with soap/detergent and rinse with potable water before reuse.

III Agency Standards for the Proposed Change:

Disinfectants for Use on Hard Surfaces (Additional Bacteria)

Effectiveness of disinfectants against specific bacteria other than those named in the AOAC Use-Dilution Method, AOAC Germicidal Spray Products as Disinfectants Method, AOAC Fungicidal Test, and AOAC Tuberculocidal Activity Method, must be determined by either the AOAC Use-Dilution Method or the AOAC Germicidal Spray Products as Disinfectants Method. Ten carriers must be tested against each specific microorganism with each of 2 product samples, representing 2 different product lots. To support products labeled as "disinfectants" for specific bacteria (other than those bacteria named in the above test methods), killing of the specific microorganism on all carriers is required. In addition, plate count data must be submitted for each microorganism to demonstrate that a concentration of at least 10^4 microorganisms survived the carrier-drying step. These Agency standards are presented in DIS/TSS-1.

Disinfectants for Use as Fungicides (Against Pathogenic Fungi)

The effectiveness of liquid disinfectants against specific pathogenic fungi must be supported by efficacy data derived from each of 2 product samples representing 2 different product lots using the AOAC Fungicidal Test. The highest dilution that kills all fungal spores is the minimum effective concentration. These Agency standards are presented in DIS/TSS-6.

Alternatively, the AOAC Use-Dilution Method may be modified to conform with the appropriate elements in the AOAC Fungicidal Test. If the product is intended to be used as a spray product, the AOAC Germicidal Spray Products as Disinfectants Method must be

employed. The inoculum in the test must be modified to provide a concentration of at least 10^6 conidia per carrier. Ten carriers on each of 2 product samples representing 2 different product lots must be employed in the test. Killing of the specific pathogenic fungi on all carriers is required. These Agency standards are also presented in DIS/TSS-6.

Virucides

The effectiveness of virucides against specific viruses must be supported by efficacy data that simulates, to the extent possible in the laboratory, the conditions under which the product is intended to be used. Carrier methods that are modifications of either the AOAC Use-Dilution Method (for liquid disinfectants) or the AOAC Germicidal Spray Products as Disinfectants Method (for spray disinfectants) must be used. To simulate in-use conditions, the specific virus to be treated must be inoculated onto hard surfaces, allowed to dry, and then treated with the product according to the directions for use on the product label. One surface for each of 2 different product lots of disinfectant must be tested against a recoverable virus titer of at least 10^4 from the test surface for a specified exposure period at room temperature. Then, the virus must be assayed by an appropriate virological technique, using a minimum of four determinations per each dilution assayed. Separate studies are required for each virus. The calculated viral titers must be reported with the test results. For the data to be considered acceptable, results must demonstrate complete inactivation of the virus at all dilutions. When cytotoxicity is evident, at least a 3-log reduction in titer must be demonstrated beyond the cytotoxic level. These Agency standards are presented in DIS/TSS-7.

Supplemental Claims

An antimicrobial agent identified as a "one-step" disinfectant or as effective in the presence of organic soil must be tested for efficacy with an appropriate organic soil load, such as 5 percent serum. These Agency standards are presented in DIS/TSS-2. On a product label, the hard water tolerance level may differ with the level of antimicrobial activity (e.g., sanitizer vs. disinfectant) claimed. To establish efficacy in hard water, all microorganisms (i.e., bacteria, fungi, viruses) claimed to be controlled must be tested by the appropriate Recommended Method at the same hard water tolerance level. These Agency standards are also presented in DIS/TSS-2.

IV Comments on the Submitted Studies:

1. MRID 464805-01 "AOAC Use-Dilution Method Fungicidal Modification" for Kickstart, by Kathleen A. Baxter. Study conducted at Hill Top Research, Inc. Study completion date – November 1, 2002. Laboratory Project No. 02-120838-106.

This study was conducted against *Aspergillus fumigatus* (ATCC 10894) and *Escherichia coli* (ATCC 11229). Two lots (Lot Nos. 201960 and 202760) of the product, *Kickstart*, were tested using the AOAC Use-Dilution Method (modified for fungi) or the AOAC Use-Dilution Method as described in the AOAC Official Methods of Analysis, 15th Edition, 1990 and in the AOAC International Official Methods of Analysis, 17th Edition, 2000. Horse serum was added to the culture to achieve a 5% organic soil load. A 1:256 use solution was prepared using 400 ppm AOAC synthetic hard water (titration results not provided). Ten (10) stainless steel penicylinder carriers were immersed for 15 minutes in the suspensions of the test organisms. The carriers were dried for 40 minutes at $37 \pm 1^\circ\text{C}$. Each carrier was exposed to the use solution for 10 minutes at $20 \pm 1^\circ\text{C}$. Carriers contaminated with *Aspergillus fumigatus* were transferred to tubes of Potato Dextrose Broth with 25 mL/L AOAC Stock Neutralizer to neutralize. Tubes

containing Letheen Broth were used to neutralize carriers contaminated with *Escherichia coli*. Secondary subcultures were transferred 30 minutes after the primary subcultures. All *Aspergillus fumigatis* subcultures were incubated for 8 days at $25\pm 1^{\circ}\text{C}$. *Escherichia coli* subcultures were incubated for 49.5 hours at $25\pm 1^{\circ}\text{C}$. The subcultures were examined for the presence or absence of visible growth. Controls included those for viability and dried carrier count. According to the laboratory report, neutralizer effectiveness testing was conducted under a study assigned Hill Top Research Study No. 01-109138-106.

2. MRID 464805-02 "Virucidal Effectiveness Test, Marek's disease virus" for Kickstart, by M. Khalid Ijaz. Study conducted at MicroBioTest, Inc. Study completion date – May 30, 2003. Laboratory Project Identification Number 431-111.

This study was conducted against Marek's disease virus (Strain not specified; obtained from Charles River Laboratories, SPAFAS), using primary chicken embryo fibroblasts (originally obtained from Charles River Laboratories, SPAFAS) as the host system. Two lots (Lot Nos. 300960 and 301160) of the product, Kickstart, were tested according to a MicroBioTest Protocol titled "Virucidal Effectiveness Test, Marek's disease virus," dated February 19, 2003 (copy provided). The stock virus culture contained at least a 5% organic soil load. A 1:384 use solution was prepared using 400 ppm AOAC synthetic hard water (titration results not provided). Films of virus were prepared by spreading 0.2 mL of virus inoculum uniformly over the bottoms of separate sterile glass Petri dishes. The virus films were dried at room temperature for 30 minutes. For each lot of product, separate dried virus films were treated with 2.0 mL of the use solution. The virus films were completely covered with the use solution, and remained exposed to the product for 10 minutes at $20\pm 2^{\circ}\text{C}$. After exposure, the plates were neutralized with 2.0 mL of fetal bovine serum supplemented with 0.1% sodium thiosulfate and 0.0001% Catalase, and the mixture was scraped from the surface of the dish with a cell scraper. Each sample (0.5 mL) was loaded onto pre-spun Sephacryl columns and spun to obtain the eluate. Ten-fold serial dilutions were prepared, using Basal medium eagles supplemented with 5% calf serum. Primary chicken embryo fibroblasts in multi-well culture dishes were inoculated in quadruplicate with an unspecified amount of the dilutions. The cultures were incubated at $37\pm 2^{\circ}\text{C}$ in $5\pm 1\%$ CO_2 for 60-90 minutes for viral adsorption. Post-adsorption, the media was aspirated, the monolayer was washed once with culture medium, and the cells were re-incubated at $37\pm 2^{\circ}\text{C}$ in $5\pm 1\%$ CO_2 for 8-10 days. Post-incubation, the cultures were fixed with TC grade alcohol, stained, and scored for the presence or absence of unspecified cytopathic effects. Controls included those for cell viability/sterility, plate recovery, column titer, viral stock titer, cytotoxicity, and neutralizer effectiveness. The 50% fluorescent focus forming unit dose per mL (FFFUD₅₀) was determined using the method of Reed and Muench.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

3. MRID 464805-03 "AOAC Fungicidal Effectiveness Test, Aspergillus fumigatis" for Kickstart, by Angela L. Hollingsworth. Study conducted at MicroBioTest, Inc. Study completion date – June 6, 2003. Laboratory Project Identification Number 431-109.

This study was conducted against *Aspergillus fumigatis* (ATCC 36607). Two lots (Lot Nos. 301160 and 300960) of the product, Kickstart, were tested using the AOAC Fungicidal Effectiveness Test as described in the AOAC Official Methods of Analysis, 16th Edition, 1995. Heat-inactivated fetal bovine serum was added to the culture to achieve a 5% organic soil load.

A 1:128 use solution was prepared using 400 ppm AOAC synthetic hard water (titration results not provided). Ten (10) tubes containing 5 mL of the use solution were inoculated with 0.5 mL of the standardized inoculum of the test organism. After 10 minutes at 20±2°C, a sample of conidia-disinfectant from each tube was transferred with a 4-mm loop and placed in 10 mL of Neopeptone Glucose Broth with 0.05% thioglycolic acid and catalase to neutralize. A secondary transfer was made from each tube to a fresh tube of 10 mL of Neopeptone Glucose Broth. All subcultures were incubated for at least 10 days at 20-30°C. The subcultures were examined for the presence or absence of visible growth. Controls included those for viability, inoculum counts, sterility, initial counts, fungistasis, and confirmation of the challenge microorganism.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

4. MRID 464805-04 "Virucidal Evaluation of *Kickstart* Against Avian Reovirus in a Suspension Assay," by Hazel R. Bowden. Study conducted at Southern Microbiology Associates, LLC. Study completion date – November 13, 2002. Laboratory Project Identification #01-7, Biocidal Test #59.

This study was conducted against Avian Reovirus (Strain 2408; obtained from MERIAL SELECT), using embryonated chicken egg cells as the host system. Two lots (Lot Nos. 104760 and 200260) of the product, Kick-Start, were tested using ASTM Standard Test Method for Efficacy of Antimicrobial Agents against Viruses in Suspension. A 1:384 use solution of the product was prepared by adding 0.1 mL of the product to 38.3 mL of 400 ppm synthetic hard water (titrated at 392.3 ppm). The stock virus culture contained a 5% organic soil load (calf serum). Test tubes containing 5 mL of the use solution were inoculated with 0.1 mL of the virus in medium. The virus remained exposed to the use solution for 10 minutes at 23°C and a relative humidity of 61%. After exposure, serial dilutions were prepared immediately in Minimum Essential Medium supplemented with 2% fetal bovine serum. The rapid dilutions served as neutralization by dilution. Embryonated eggs were inoculated into the yolk sac in quadruplicate with 0.2 mL of the dilutions. Two days post-inoculation, all eggs were candled and dead embryos were discarded. The eggs were incubated for a total of 7 days at ~37°C in at ≥50% humidity. Controls included those for toxicity, virus titer, and neutralization. Viral and cytotoxicity titers were calculated by the method of Reed and Muench.

5. MRID 464805-05 "Virucidal Evaluation of *Kickstart* for Use on Inanimate Environmental Surfaces: Test for Efficacy against Newcastle Disease Virus," by Hazel R. Bowden. Study conducted at Southern Microbiology Associates, LLC. Study completion date – November 13, 2002. Laboratory Project Identification #01-7, Biocidal Test #54.

This study was conducted against Newcastle disease virus (Strain LaSota; obtained from Charles River Laboratories, SPAFAS), using chicken embryos as the host system. Two lots (Lot Nos. 104760 and 200260) of the product, Kick-Start, were tested. The product was diluted 1:384 by adding 0.1 mL of the product to 38.3 mL of 400 ppm synthetic hard water (titrated at 397 ppm). The virus culture was used at sufficient dilution to achieve a concentration of 5% allantoic fluid as the 5% organic soil load. Films of virus were prepared by spreading 0.2 mL of virus inoculum uniformly over the bottoms of separate sterile glass Petri dishes. The virus films were dried at 24°C and 68% relative humidity for 35-45 minutes. For each lot of product, separate dried virus films were treated with 2.0 mL of the use solution. The virus films were exposed to the use solution for 10 minutes at 24°C. The 10-minute exposure time included the 30 second filtration through the Sephadex column. The filtered virus-

disinfectant mixture was diluted serially in Minimal Essential Medium supplemented with 2% fetal bovine serum. The chorio-allantoic sacs of 9-day old chicken embryos were inoculated in quadruplicate with 0.2 mL of the dilutions and then re-incubated at ~37°C and ≥50% humidity for 8 days. Controls included those for toxicity, virus titer, and neutralization. Viral and cytotoxicity titers were calculated by the method of Reed and Muench.

V. Results:

MRID Number	Organism	No. Exhibiting Growth/ Total No. Tested		Dried Carrier Count (CFU/ carrier)
		Lot No. 201960	Lot No. 202760	
464805-01	<i>Escherichia coli</i>	1° 0/10 2° 0/10	1° 0/10 2° 0/10	1.3×10^7

MRID Number	Organism	No. Exhibiting Growth/ Total No. Tested		Viability
		Lot No. 201960	Lot No. 202760	
464805-01	<i>Aspergillus fumigatus</i> (ATCC 10894)	1° 10/10 2° 10/10	1° 10/10 2° 10/10	1.9×10^5 conidia/carrier
		Lot No. 301160	Lot No. 300960	
464805-03	<i>Aspergillus fumigatus</i> (ATCC 36607)	1° 0/10 2° 0/10	1° 0/10 2° 0/10	9.0×10^5 CFU/mL

MRID Number	Organism	Results			Dried Virus Control
			Lot No. 300960	Lot No. 301160	
464805-02	Marek's disease virus	10 ⁻² to 10 ⁻⁷ dilutions	Complete inactivation	Complete inactivation	FFFUD ₅₀ /mL 10 ^{4.67}
		FFFUD ₅₀ /mL	≤ 10 ^{1.5}	≤ 10 ^{1.5}	
			Lot No. 104760	Lot No. 200260	
464805-04	Avian Reovirus	10 ⁻¹ to 10 ⁻⁶ dilutions	Complete inactivation	Complete inactivation	TCID ₅₀ /0.2 mL 10 ^{5.0}
		TCID ₅₀ /0.2 mL	≤ 10 ^{0.5}	≤ 10 ^{0.5}	
464805-05	Newcastle disease virus	10 ⁻¹ to 10 ⁻⁴ dilutions	Complete inactivation	Complete inactivation	TCID ₅₀ /0.2 mL 10 ^{4.3}
		TCID ₅₀ /0.2 mL	≤ 10 ^{0.5}	≤ 10 ^{0.5}	

VI. Conclusions:

1. The submitted efficacy data (MRID No. 464805-01) do not currently support the use of the product, *Kickstart*, as a disinfectant with bactericidal activity against *Escherichia coli* on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load (horse serum) for a contact time of 10 minutes at a 1:256 dilution. No growth was observed in the subcultures of the carriers tested against two lots of the product; however, the results of neutralizer effectiveness testing were not reported. Dried carrier counts were at least 10⁴. Viability controls were positive for growth. Purity controls were not reported. Sterility controls were not reported. The applicant needs to provide the results of neutralizer effectiveness testing, which was apparently conducted under a study assigned Hill Top Research Study No. 01-109138-106.
2. The submitted efficacy data (MRID No. 464805-01) do not support the use of the product, *Kickstart*, as a fungicide against *Aspergillus fumigatis* (ATCC 10894) on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load (horse serum) for a contact time of 10 minutes at a 1:256 dilution. Growth was observed in all of the subcultures of the carriers tested against two lots of the product. [Note: The proposed label does not claim effectiveness against this fungus.]
3. The submitted efficacy data (MRID No. 464805-03) support the use of the product, *Kickstart*, as a disinfectant with fungicidal activity against *Aspergillus fumigatis* (ATCC 36607) on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load (heat-inactivated fetal bovine serum) for a contact time of 10 minutes at a 1:128 dilution. No growth was observed when the product was tested against two lots of the product. Viability controls were positive for growth. Sterility controls did not show growth. Fungistatic streaks exhibited no growth.

4. The submitted efficacy data support the use of the product, Kickstart, as a disinfectant with virucidal activity against the following microorganisms on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic soil load for a contact time of 10 minutes at a 1:384 dilution:

Avian Reovirus	MRID No. 464805-04
Marek's disease virus	MRID No. 464805-02
Newcastle disease virus	MRID No. 464805-05

Complete inactivation (no growth) was indicated in all dilutions tested. Cytotoxicity was not observed. Recoverable virus titers of at least 10^4 were achieved.

VII. Recommendations:

1. The proposed label claims that the product, Kickstart, is an effective disinfectant against *Escherichia coli* on hard, non-porous surfaces when used at a 1:256 dilution in the presence of 400 ppm hard water and a 5% organic load for a contact time of 10 minutes. Data provided by the applicant do not currently support this claim. As discussed in the Conclusions Section of this report, the applicant needs to provide the results of neutralizer effectiveness testing.

2. The proposed label claims that the product, Kickstart, is an effective disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of 400 ppm hard water and a 5% organic load for a contact time of 10 minutes when used at the dilutions specified:

<i>Aspergillus fumigatis</i> (ATCC 36607)	1:128 dilution
Avian Reovirus (MERIAL SELECT strain 2408)	1:384 dilution
Marek's disease virus (Spafas strain)	1:384 dilution
Newcastle disease virus (Spafas strain)	1:384 dilution

Data provided by the applicant support these claims.

3. The proposed label also includes claims of effectiveness against the following microorganisms:

Staphylococcus aureus (ATCC 6538)
Listeria monocytogenes (ATCC 15313)
Mycoplasma gallinarum (ATCC 19708)
Salmonella choleraesuis serotype *enteritidis* (ATCC 13076)
Pseudomonas aeruginosa (ATCC 15442)
Infectious Bursal Disease of Chickens (ATCC D78, VR-2041)

This data package did not include efficacy data to support these claims, nor was a data matrix which listed these organisms with the citations for MRIDs included in the current data package. It has been determined by additional review of previous submissions (DP 286206, dated January 22, 2003 and DP 308939, dated December 7, 2004) that efficacy testing has been conducted and is acceptable for all the organisms listed above.

5. In the future, the registrant or its representative must include a data matrix listing all organisms previously accepted by the Agency and listed on the proposed label.

6. The applicant must make the following changes to the proposed label, as appropriate:

On page 1, change "*Salmonella Chloresuis*" to read "*Salmonella choleraesuis*".

On page 3, change "Procedures for leak of spill" to read "Procedures for leak or spill."

On page 3, change "'regulatory agencies should be contacted by prior to disposal" to read "regulatory agencies should be contacted prior to disposal."

On page 3, change "Kickstart which is to discharged, should be disposed" to read "Dispose of *Kickstart*"

DATA PACKAGE BEAN SHEET

Date: 10-Mar-2005

Page 1 of 2

***** Registration Information *****

Registration: 71355-E - CID 2000

Company: 71355 - CID LINES N.V.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 02-Mar-2005

Calculated Due Date: 25-Jun-2005

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (188) ADDITIONAL USE, NEW REGISTRATION: OLD INGREDIENT, ME-TDO:

Ingredients: 000595, Hydrogen peroxide(20%)

***** Data Package Information *****Expedite: ☐ Yes ☒ No

Date Sent: 09-Mar-2005

Due Back:

DP Ingredient: 000595, Hydrogen peroxide

DP Title:

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: AD / PSB

Administrative Due Date: 12-Jun-2005

Team Name: EET

Negotiated Due Date:

Reviewer Name:

Projected Completion Date:

Contractor Name:

***** Studies Sent for Review *****

No Studies

***** Additional Data Package for this Decision *****

Printed on Page 2

***** Data Package Instructions *****

Resubmitted additional efficacy studies for review; MRID Nos. 46480501, 46480502, 46480503, 46480504, 46480505, label and CSF included with this data package.

Action Code 188, Admin Due Date 06/25/05, EET Due Date 05/25/05, FOQA

Laird's Regulatory Consultants, Inc

Over 32 years Experience and Expertise in The Regulation of Pesticide Products

February 22, 2005

484805-00

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management I
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: CID 2000
EPA FILE SYMBOL 71355-E
Your letter dated January 13, 2005

Dear Mr. Swindell:

Please find attached hereto, per my conversation with Ms. Leavy-Munk, concerning the product name change from CID 2000 KICKSTART. This is being done in an attempt to eliminate further questions or concerns about the name of the product as it is associated with the date being submitted.

The original application was submitted under the name of CID 2000 but during the process the company decided that they want the name KICKSTART so all data belongs to the same product. So I would like to request that the name be officially changed to KICKSTART as a part of the records for this registration.

Also attached hereto is 5 volumes of efficacy data to address the data requirements specified in the letter referenced above.

Should you have questions or concerns please don't hesitate to let me know.

Sincerely,


Olivia D. Laird
President/Owner/Agent

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter and Sponsor

SUBMITTER

Laird's Regulatory Consultants, Inc.
17804 Braemar Place
Leesburg, VA 20175

SPONSOR

Mr. Vincent Catry
NV Cid Lines
Waterpoortstaat 2
8900 Ieper Belgium

2. Regulatory Action to Be Taken

Resubmission of additional efficacy data to support claims

EPA File Symbol/ Reg. No.: 71355-E

Product Name: KICKSTART old name CID 2000

Transmittal Date

February 23, 2005

3. List of Submitted Studies

Volume 1: Administrative Materials

46480501 Volume 2: Efficacy Data- AOAC Use Dilution Method, Fungicidal Modification

46480502 Volume 3: Efficacy Data-Virucidal Effectiveness (Marek's disease virus)

46480503 Volume 4: Efficacy Data- Virucidal Efficacy Test (Aspergillus Fumigatus)

46480504 Volume 5: Efficacy Data- Virucidal Evaluation of KICKSTART AGAINST
Avian Reovirus in a suspension Assay

46480505 Volume 6: Efficacy Data- Virucidal Evaluation of KICKSTART for use on
Inanimate Environmental Surfaces against Newcastle Disease Virus

Company Official:  for Vincent Catry
Olivia D. Laird

Company Contact: Olivia D. Laird
Phone: (703) 669-0509
Fax: (703) 669-4608

VOLUME I OF 6

KICKSTART

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :	
HYDROGEN PEROXIDE	26.5%
PEROXYACETIC ACID	4.9%
Inert ingredients	68.6 %
	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Kickstart is effective against :

Bacteria :	dilution
<i>Staphylococcus aureus</i> (ATCC 6538)	1:256
<i>Escherichia coli</i> (ATCC 11229)	1:256
<i>Listeria monocytogenes</i> (ATCC 15313)	1:512
<i>Mycoplasma gallinarum</i> (ATCC 19708)	1:512
<i>Salmonella Choleraesuis</i> serotype enteritidis (ATCC 13076)	1:512
<i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :	
<i>Aspergillus fumigatus</i> (ATCC 36607)	1:128
Virus (on environmental surfaces) :	
Infectious Bursal Disease of Chickens (ATCC D78, VR-2041)	1:384
Newcastle Disease (Spafas strain 539016)	1:384
Avian Reovirus (MERIAL SELECT strain 2408)	1:384
Marek's Disease virus (Spafas strain)	1:384

All tests in the presence of 400ppm AOAC hard water and 5% organic load.

FIRST AID STATEMENTS	
IF IN EYES	<ul style="list-style-type: none"> Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN :	
Probable mucosal damage may contraindicate the use of gastric lavage	

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :



Produced by :
CID LINES NV/SA
Waterpoortstraat 2 – B 8900 IEPER
BELGIUM – EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return Kickstart to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute Kickstart with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. Kickstart which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. **Kickstart** is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labelling.

1. *Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :*

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.



Produced by :
CID LINES NV/SA
Waterpoortstraat 2 – B 8900 IEPER
BELGIUM – EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com – info@cidlines.com

KICKSTART

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :	
HYDROGEN PEROXIDE	26.5%
PEROXYACETIC ACID	4.9%
Inert ingredients	68.6 %
	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Kickstart is effective against :

Bacteria :	dilution
<i>Staphylococcus aureus</i> (ATCC 6538)	1:256
<i>Escherichia coli</i> (ATCC 11229)	1:256
<i>Listeria monocytogenes</i> (ATCC 15313)	1:512
<i>Mycoplasma gallinarum</i> (ATCC 19708)	1:512
<i>Salmonella Choleraesuis</i> serotype enteritidis (ATCC 13076)	1:512
<i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :	
<i>Aspergillus fumigatis</i> (ATCC 36607)	1:128
Virus (on environmental surfaces) :	
Infectious Bursal Disease of Chickens (ATCC D78, VR-2041)	1:384
Newcastle Disease (Spafas strain 539016)	1:384
Avian Reovirus (MERIAL SELECT strain 2408)	1:384
Marek's Disease virus (Spafas strain)	1:384

All tests in the presence of 400ppm AOAC hard water and 5% organic load.

FIRST AID STATEMENTS	
IF IN EYES	<ul style="list-style-type: none"> Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage	

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :



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2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return Kickstart to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute Kickstart with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. Kickstart which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. **Kickstart** is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. *Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :*

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- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
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KICKSTART

CONCENTRATED BROAD SPECTRUM DISINFECTANT

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Inert ingredients	68.6 %
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KEEP OUT OF REACH OF CHILDREN

DANGER

Kickstart is effective against :

Bacteria :	dilution
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All tests in the presence of 400ppm AOAC hard water and 5% organic load.

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NOTE TO PHYSICIAN :	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

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4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return Kickstart to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute Kickstart with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

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3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

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Remove contaminated clothing and wash before reuse.

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NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage	

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :
EXPIRY DATE :



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STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. **Kickstart** is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.



Produced by :
CID LINES NV/SA
Waterpoortstraat 2 - B 8900 IEPER
BELGIUM - EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

Administrative

Materials

DATA PACKAGE BEAN SHEET

Date: 09-Mar-2005

Page 1 of 1

***** Registration Information *****

Registration: 2568-RNR - ANTIFOULING SEAVICTOR 50 DARK RED 3GBDRD

Company: 2568 - JOTUN PAINTS INC.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 07-Mar-2005

Calculated Due Date:

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT, NON-FAST TRACK, FIFRA SEC. 2(MM) USES:

Ingredients: 025601, Cuprous oxide(39.59%)

128101, 3(2H)-Isothiazolone, 4,5-dichloro-2-octyl-(.87%)

***** Data Package Information *****Expedite: ☐ Yes ☒ No

Date Sent: 09-Mar-2005

Due Back:

DP Ingredient: 025601, Cuprous oxide

128101, 3(2H)-Isothiazolone, 4,5-dichloro-2-octyl-

DP Title:

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #:

Assigned To**Date In****Date Out**

Organization: AD / RASSB

Administrative Due Date: 05-Sep-2005

Team Name: RASSB1

Negotiated Due Date:

Reviewer Name:

Projected Completion Date:

Contractor Name:

***** Studies Sent for Review *****

No Studies

***** Additional Data Package for this Decision *****

No Additional Data Packages

***** Data Package Instructions *****

Please review the submitted leach rate studies. Action code A54

SUBM. DUE DATE 01-14-05

REVIEWER K. Leavy-Muenk

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTS

FILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 188

DESCRIPTOR Add. Use - New Reg. FOIPA X NFIPA PRIA

☐ CHILD RESISTANT PACKAGING: ☐ REQUIRED ☐ NOT REQUIRED

REGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONAL ☐ RESTRICTED USE

PM RECEIVE DATE

09116104

FORMULATORS EXEMPTION

[] SUBMITTED [] NOT SUBMITTED
[] N/A

DATE
RETURNED

CHEMISTRY _____] [_____] [_____] [_____]

EFFICACY _____] [_____] [_____] [_____]

ACUTE TOX. _____] [_____] [_____] [_____]

RASSE TOX. _____) [_____] [_____] [_____]

ENVIRON. DATE _____] _____] _____] _____]

FISH/WILDLIFE_____] [_____] [_____] [_____]

OTHER: _____

STATUS _____

RESPONSE DATE 01-13-05 ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 19 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Olivia Laird
Regulatory Agent for,
c/o NV Cid Lines SA
Laird's Regulatory Consultants, Inc.
501 South Lincoln Ave.
Sterling, VA 20164-2024

Subject: CID 2000
EPA File Symbol 71355-E
Your Application Dated September 16th, 2004
EPA Received Date September 16th, 2004

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to add efficacy claims to the proposed product labeling, is unacceptable.

EFFICACY

The acceptable data for *Salmonella choleraesuis* has not been submitted to the Agency for our review. Therefore, the product is not supported as a general, broad spectrum disinfectant.

However, the product has been found to be effective against both *Pseudomonas aeruginosa* and *Staphylococcus aureus*.

LABELING

The proposed label claims that the product, CID 2000, is an effective disinfectant against *Pseudomonas aeruginosa* in the presence of 400 ppm AOAC hardwater and a 5% soil load at a dilution of 1:200 for a contact time of 10 minutes. These claims are acceptable and supported by submitted data.

The proposed label makes no claim for *Salmonella choleraesuis* ATCC 10708. Adequate efficacy data must be submitted for this organism to maintain the broad spectrum disinfectant claim that appears on the label. Until this data is submitted the use of the phrase "broad spectrum disinfectant" is unacceptable.

The proposed label claims that the product is efficacious against *Escherichia coli* ATCC 11229, at a dilution of 1:256 for a contact time of 10 minutes. This claim is unacceptable. Our letter of January 29th, 2003, explained that the submitted study for *E. coli* at a dilution of 1:512 failed as there was no growth on the 10 carriers. There is no record of a current submission that included new data for *E. coli* which meets the Agency requirements, or a study that was conducted at the label specified dilution. Resubmit data that supports the label claim for *Escherichia coli* at 1:256 dilution.

Aspergillus fumigatus is an organism of public health concern. The proposed label claims that the product is effective against this organism at a 1:128 concentration and a contact time of 10 minutes. This claim is unacceptable and must be removed from the product label unless efficacy data is submitted to support this claim.

Submit data to support the labeling claims for Salmonella choleraesuis, Escherichia coli, and Aspergillus fumigatus.

OR

Delete all claims that reference the following organisms; Salmonella choleraesuis, Escherichia coli, and Aspergillus fumigatus from the proposed product labeling.

Resubmit corrected efficacy data for Salmonella choleraesuis to support the use of the product as a general, broad spectrum disinfectant.

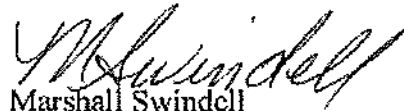
A complete copy of the efficacy review is enclosed for your records.

The Agency reserves a full label review until the above discrepancies have been clarified.

The product may not be lawfully distributed in interstate commerce until the above discrepancies have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

Laird's Regulatory Consultants, Inc

Over 28 years Experience and Expertise in The Regulation of Pesticide Products

September 16, 2004

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: CID 2000 (Kickstart)
EPA FILE SYMBOL 71355-E
Resubmission of additional corrected data to support registration

Dear Mr. Swindell:

Attached hereto please find five (5) copies of the revised labeling containing our proposed uses. Also included with this package are the supportive corrected efficacy data which will address efficacy concerns for the product referenced.

Please note, the name Kickstart, as was explained in an earlier letter from the registrant contained on the efficacy data, is just one of the potential additional brand names for this product. Rest assured it is the same formula.

Thank you for your help in this matter. Should you have any questions or concerns please don't hesitate to let me know.

Sincerely,


Olivia D. Laird
President/Agent

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter and Sponsor

SUBMITTER

Laird's Regulatory Consultants, Inc.
17804 Braemar Place
Leesburg, VA 20175

SPONSOR

Mr. Vincent Catry
NV Cid Lines
Waterpoortstaat 2
8900 Ieper Belgium

2. Regulatory Action to Be Taken

Resubmission of additional corrective data per Agency's Request

EPA File Symbol/ Reg. No.: 71355-E

Product Name: Cid 2000/ Kickstart


Transmittal Date

September 16, 2004

3. List of Submitted Studies

Volume 1: Administrative Materials

46364201 Volume 2: Efficacy Data (AOAC Use Dilution Test)

Company Official:  for Vincent Catry
Olivia D. Laird

Company Contact: Olivia D. Laird

Phone: (703) 669-0509

Fax: (703) 669-4608

VOLUME I

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :
HYDROGEN PEROXIDE
PEROXYACETIC ACID
Inert ingredients

26.5%
4.9%
68.6 %
100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

CID 2000 is effective against :

Bacteria :	dilution
<i>Staphylococcus aureus</i> (ATCC 6538)	1:256
<i>Escherichia coli</i> (ATCC 11229) <i>not susceptible</i>	1:256
<i>Listeria monocytogenes</i> (ATCC 15313)	1:512
<i>Mycoplasma gallinarum</i> (ATCC 19708)	1:512
<i>Salmonella</i> (<i>Chloroaeus</i>) <i>serotype enteritidis</i> (ATCC 13076)	1:512
<i>Pseudomonas Aeruginosa</i> (ATCC 15442)	1:200
Fungus (on environmental surfaces) :	
<i>Aspergillus fumigatus</i> (ATCC 36607) <i>Fumigatus</i>	1:128
Virus (on environmental surfaces) :	
<i>Infectious Bursal Disease of Chickens</i> (ATCC D78, VR-2041)	1:384
<i>Newcastle Disease</i> (Spafas strain 539016)	1:384
<i>Avian Reovirus</i> (MERIAL SELECT strain 2408)	1:384
<i>Marek's Disease virus</i> (Spafas strain)	1:384

All tests in the presence of 400ppm AOAC hard water and 5% organic load.

FIRST AID STATEMENTS

IF IN EYES	<ul style="list-style-type: none"> Hold eyelids open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN or CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN :

Probable mucosal damage may contraindicate the use of gastric lavage

EPA Reg. N° : 71355-
EPA Est. N° : 71355-BEL-001

NET CONTENTS : 1 - 5 gallon(s)

BATCH N° :
EXPIRY DATE :

CID LINES
INNOVATIVE HYGIENE SOLUTIONS

Produced by :
CID LINES NV/SA
Waterpoortstraat 2 - B 8900 IEPER
BELGIUM - EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trucks and other vehicles*

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible ; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.



Produced by :
CID LINES NV/SA
Waterpoortstraat 2 - B 8900 IEPER
BELGIUM - EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product



Produced by :
CID LINES NV/SA
Waterpoortstraat 2 - B 8900 IEPER
BELGIUM - EUROPE
Phone : 011 32 57 217877
Fax : 011 32 57 217879
www.cidlines.com - info@cidlines.com

DP Sequence: 308939 Expedite: ☐ Yes ☒ No Label: ☒ Yes ☐ No CSF: ☒ Yes ☐ No

Bean Count: 1 Date Package Title:

Parent DP #: Date Package Type:

Instructions: PLEASE REVIEW THE SUBMITTED AOAC USE DILUTION TEST AND PROPOSED LABELING
 ADMIN DUE DATE 01/14/05, ETT DUE DATE 12/14/04, ACTION CODE 188, FQPA

Unlock Data Pkg

Bean Sheet

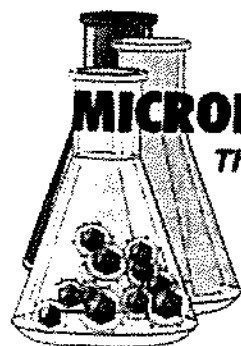
☒ Sent To ☒ Sent From ☒ DP Dates ☒ MRDS ☒ Sub-DP ☒ DP Ingredients ☒ DP Contract ☒ Receipts

☒ Data Package Comments ☒ Waiver Documentation

Comment

Submitted data for *P. aeruginosa* was acceptable. Acceptable data for *S. choleraesuis* has still not been submitted, therefore making the claim of broad spectrum disinfectant unacceptable until such data is provided. Also no data provided to support *E. coli* or *Aspergillus fumigatus* label claims. Label required a few other changes.

Viewing Record 1 of 1


MICROBIOTEST, INC
*The Microbiology and
Virology Laboratory*

 Volume 2

FINAL REPORT **AOAC USE DILUTION TEST**

Test Agent: Kickstart
Data Requirements
 EPA Guidelines 810.2100 (c), (d), (e)

Author
Felicia L. Sellers
Study Completion Date
05/30/03
Performing Laboratory
MICROBIOTEST, INC.
105B Carpenter Drive
Sterling, Virginia 20164
Laboratory Project Identification Number
431-107

Submitted to: NV CID LINES
Waterpoortstraat 2
Industnezone Isperieekanaal 8900
IEPER BELGIUM



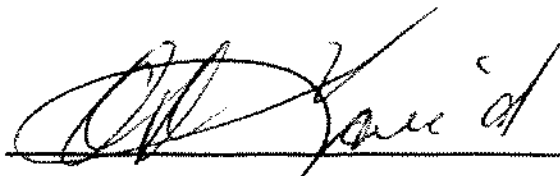
STATEMENT OF NO DATA CONFIDENTIALITY

Title: AOAC Use Dilution Test

Performed by: MICROBIOTEST, INC.
105B Carpenter Drive
Sterling, Virginia 20164

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA § 10(d)(1)(A), (B) or (C).

Company Agent



9/16/04
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 7, 2004

MEMORANDUM

Subject: Efficacy Review for CID 2000, EPA Reg. No. 71355-E;
DP Barcode: D308939

From: Marcie Wawzysko, Microbiologist
Product Science Branch
Antimicrobials Division (7510C)

Marcie Wawzysko
12/7/04

Thru: Nancy Whyte, Acting Team Leader
Product Science Branch
Antimicrobials Division (7510C)

Nancy Whyte
December 8, 2004

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

To: Marshall Swindell PM 33 / Karen Leavy
Regulatory Management Branch I
Antimicrobials Division (7510C)

Applicant: CID Lines N.V.
Waterpoortstraat 2
B 8900 Ieper, Belgium- Europe

Formulation from the Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen Peroxide.....	26.5%
Peroxyacetic Acid.....	4.9%
<u>Other ingredients</u>	68.6%
Total.....	100.0%

I. BACKGROUND

The product, CID 2000 (EPA Reg. No. 71355-E), is a new product. The applicant has requested to register the product as a broad spectrum disinfectant (bactericide, virucide, fungicide) for use on hard, non-porous surfaces in farm, animal, and poultry housing facilities and equipment, food processing plants, and hatcheries. The label claims that the product is effective in the presence of 40ppm AOAC hard water and a 5% organic soil load. The applicant has resubmitted data for *Pseudomonas aeruginosa* in response to an Agency request. The submitted study was conducted at MicroBioTest Inc., located at 105B Carpenter Drive in Sterling, VA 20164.

The data package contained a letter from the applicant's representative to the Agency (dated September 16, 2004), Agency form 8570-4 (Confidential Statement of Formula), one study (MRID 463642-01) with Statements of No Data Confidentiality, Compliance, and Quality Assurance, and the proposed label (pin-punched September 16, 2004 by the Agency).

Note: Information in the data package indicates that Kickstart is an alternate reference name for the product, CID 2000.

II. USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces on farm equipment, animal housing buildings, floors, walls, pens, stalls, chutes, cages, feeding/drinking equipment, handling/restraining equipment, vehicles, hatchers, setters, trays, racks, carts, tables, chick boxes, and animal cages. The product may be used on hard, non-porous surfaces such as steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, and sealed brick walls.

Directions on the proposed label provide the following information regarding preparation and use of the product as a disinfectant on farm equipment and animal housing buildings: Thoroughly clean surfaces with soap or detergent. Rinse with water. Saturate surfaces with disinfection solution using spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Rinse feeding and watering appliances with potable water before reuse.

The proposed label also includes directions for the disinfection of hatcheries, food processing plants, and trucks and other vehicles.

III. AGENCY STANDARDS FOR PROPOSED CLAIMS

Disinfectants for Use on Hard Surfaces in Hospital or Medical Environments

The effectiveness of disinfectants for use on hard surfaces in hospital or medical environments must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). The tests require that sixty carriers must be tested

with each of 3 samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* ATCC 10708 (for effectiveness against Gram-negative bacteria), *Staphylococcus aureus* ATCC 6538 (for effectiveness against Gram-positive bacteria), and *Pseudomonas aeruginosa* ATCC 15442 (representative of a nosocomial pathogen). [180 carriers per sample; a total of 540 carriers] To pass performance requirements, tests must result in killing in 59 out of each set of 60 carriers to give a 95% confidence level. These agency standards can be found in DIS/TSS-1.

Supplemental Recommendations

Antimicrobial agents which claim to be "one-step" cleaner-disinfectants, or cleaner-sanitizers, or agents to be used in the presence of organic soil, must undergo appropriate efficacy testing modified to include a representative organic soil of 5% blood serum. A suggested method to simulate antimicrobial treatment of dry inanimate surfaces is to add the blood serum 5% v/v (19mL bacterial inoculum with 1mL blood serum) to bacterial inoculum prior to carrier contamination and drying. Control data should be produced as described in Supplemental Recommendation 6 of DIS/TSS-2 to confirm the validity of this test with this modification. The suggested organic soil level is appropriate for simulation of lightly to moderately soiled surfaces. For highly soiled surfaces, a prior cleaning step should be recommended on the product label. A suggested procedure for incorporating organic soil load where the antimicrobial agent is not tested against a dry inanimate surface, such as the AOAC Fungicidal Test involves adding 5% v/v blood serum directly to the test solution (e.g., 4.75 ml test solution + 0.25 ml blood serum) before adding 0.5 ml of the required level (5×10^6 /ml) of conidia. These agency standards can be found in DIS/TSS-2.

IV. SUMMARY OF SUBMITTED STUDY

MRID 463642-01 "AOAC Use Dilution Test" for Kickstart by Felicia L. Sellers. Study conducted by MicroBio Test, Inc., Laboratory Project Number 431-107. Study completed May 30, 2004.

This study was conducted against *Pseudomonas aeruginosa* ATCC 15442. Three lots (Lot Nos. 301160, 300960, and 300260) of the product, Kickstart, were tested using the AOAC Use Dilution Test Method as described in AOAC Official Methods of Analysis, 16th Edition, 1995. At least one of the product lots (Lot No. 300260) was at least 60 days old at the time of testing. A 1:200 use solution of the product was prepared using 400 ppm AOAC hard water. Heat-inactivated horse serum was added to the inoculum to create a 5% organic soil load. Sterile stainless steel penicylinder carriers were inoculated with 48-54 hour old bacterial cultures at a ratio of 1mL inocula per carrier. Carriers remained in contact with the inoculum for 15 minutes at room temperature then dried for 25 minutes at $37 \pm 2^\circ\text{C}$. Contaminated carriers were exposed to 10 mL aliquots of the test agent for 10 minutes at $20 \pm 1^\circ\text{C}$ then transferred to letheen broth containing 0.05% thioglycolic acid and catalase to neutralize. Subcultures were incubated for 48 ± 2 hours at $37 \pm 2^\circ\text{C}$ and examined for the presence or absence of visible growth. Study controls included those for sterility, neutralizer effectiveness, carrier counts, viability, bacteriostasis, and confirmation of the challenge microorganism.

V. RESULTS

MRID Number	Organism	Results (Tubes with growth/Total Tubes)			Dried Carrier Count (Avg. CFU/Carrier)
		Lot No. 301160	Lot No. 300960	Lot No. 300260	
463642-01	<i>Pseudomonas aeruginosa</i>	0/60	0/60	0/60	2.1×10^5

VI. CONCLUSIONS

The submitted efficacy data (MRID No. 463642-01) support the use of the product, CID 2000, as a disinfectant with bactericidal activity against *Pseudomonas aeruginosa* on hard, non-porous surfaces for a contact time of 10 minutes at a dilution of 1:200 in the presence of hard water and a 5% organic load. No growth was seen on any of the carriers tested for the three product lots (one of which being at least 60 days old). The dried carrier count exceeded 10^4 . Study controls met the criteria for a valid test.

However, even though the product has been found to be effective against both *Pseudomonas aeruginosa* and *Staphylococcus aureus*, acceptable data for *Salmonella choleraesuis* has not been submitted. Thus the product is **not supported** for use as a general, broad spectrum disinfectant.

VII. RECOMMENDATIONS

1. The proposed label claims that the product, CID 2000, is an effective disinfectant against *Pseudomonas aeruginosa* in the presence of 400 ppm AOAC hard water and a 5% soil load at a dilution of 1:200 for a contact time of 10 minutes. These claims are **acceptable** and supported by submitted data.
2. The proposed label makes no claim for *Salmonella choleraesuis* ATCC 10708. Adequate efficacy data must be submitted for this organism to maintain the broad spectrum disinfectant claim that appears on the label. Until this data is submitted the use of the phrase "broad spectrum disinfectant" is **unacceptable**.
3. The proposed label claims that the product is efficacious against *Escherichia coli* ATCC 11229, at a dilution of 1:256 for a contact time of 10 minutes. This claim is **unacceptable**. A January 29, 2003 letter to the applicant's representative explained that the submitted study for *E.coli* at a dilution of 1:512 failed as there was growth on the 10 carriers. There is no record of the applicant submitting new data for *E.coli* which meets Agency requirements, or a study that was conducted at the label specified

dilution. The applicant must submit data to support the label claim for *Escherichia coli* at a 1:256 dilution.

4. *Aspergillus fumigatus* is an organism of public health concern. The proposed label claims that the product is effective against this organism at a 1:128 concentration and a contact time of 10 minutes. This claim is **unacceptable** and must be removed from the product label unless efficacy data is submitted to support this claim.
5. The following administrative changes need to be made to the proposed label:
 - a. On page 1, *Salmonella choleraesuis* serotype *enteritidis* is incorrectly spelled "*Salmonella Choleraesuis* serotype *enteritidis*." This must be corrected.
 - b. On page 1, *Aspergillus fumigatus* is incorrectly spelled "*Aspergillus fumigatis*." This must be corrected.
 - c. On page 2, brick walls are listed as a use surface. Brick is porous, this reference must be either removed from the label or altered to read "sealed brick walls."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 16, 2003

MEMORANDUM:

Subject: Efficacy Review for EPA Reg. No.: 71355-E, "CID 2000"
DP Barcode: D290087
Case No: 069188

From: Emily Mitchell, M.S., Team Leader
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

To: Marshall Swindell PM33/Karen Leavy-Munk
Regulatory Management Branch I
Antimicrobials Division (7510C)

Applicant: NV CID Lines SA
Waterpoortstraat 2 B 8900 Ieper
Belgium-Europe

Formulation From Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen peroxide.....	26.5%
Peroxyacetic acid.....	4.9%
<u>Inert Ingredient(s)</u>	<u>68.6%</u>
Total	100.0%

I BACKGROUND

The product, CID 2000 (EPA Reg. No. 71355-E), is a new product. The applicant requested to register the product as a broad spectrum disinfectant (bactericide, virucide) for use on hard, non-porous, non-food contact surfaces on farms and in veterinary hospitals and food processing plants. The label claims that the product is effective in the presence of "400 ppm AOAC synthetic hard water with 5% soil load." This data package is a re-submission of information in response to an EPA letter dated January 29, 2003. In its letter, EPA notified the applicant's representative that the submitted efficacy data did not support the use of the product against *Salmonella choleraesuis*. EPA requested clarification of whether 10 or 60 carriers were tested in the study against *Salmonella choleraesuis*. In addition, EPA requested additional data demonstrating effectiveness of the neutralizer against *Salmonella choleraesuis* if 60 carriers were tested. The applicant submitted amended efficacy data for the study against *Salmonella choleraesuis*. The study was conducted at Hill Top Research, Inc., located on Main and Mill Streets, Miamiville, OH 45147.

This data package contained a copy of an EPA letter to the applicant's representative (dated January 29, 2003), EPA Form 8570-4 (Confidential Statement of Formula), one study (MRID No. 459188-01), Statements of No Data Confidentiality Claim for the study, and the proposed label (pin-punched 10/1/02, by EPA).

Note: The data package also included a label for the acid-based sanitizer, CID 2000 (pin-punched 9/12/00, by EPA). The label for the acid-based sanitizer, CID 2000, appears to be irrelevant to the data package and may be a previous draft of the product label.

Note: Information in the data package indicates that Kickstart is an alternate reference name for the product, CID 2000.

Note: EPA Form 8570-4 (Confidential Statement of Formula) contains Confidential Business Information. Data or information claimed by the applicant to be FIFRA confidential has not been included in this report.

II USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces such as buildings, floors, walls, ceilings, counters, animal pens/cages, vehicle items (e.g., mats, crates, cabs, wheels), feeding/drinking equipment, and handling/restraining equipment. Directions on the proposed label provided the following information regarding preparation and use of the product as a disinfectant: Prepare use solution by mixing an appropriate amount of the product with water (1:256 to treat *Salmonella choleraesuis*). Remove all animals and feed from the area. Remove all litter and manure from floors, walls, and surfaces. Empty all feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with the use solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried. Before reuse, thoroughly scrub treated feeding and watering appliances with soap or detergent and

rinse with potable water. Disinfect equipment by immersing equipment in use solution for 10 minutes. Allow to air dry. Fresh disinfecting solution should be made daily.

III AGENCY STANDARDS FOR PROPOSED CLAIMS

Disinfectants for Use on Hard Surfaces (Against a Broad Spectrum of Microorganisms)

The effectiveness of disinfectants for use on hard surfaces must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). Sixty carriers must be tested with each of 3 product samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* (ATCC 10708) and *Staphylococcus aureus* (ATCC 6538). To support products labeled as "general disinfectants," killing on 59 out of 60 carriers is required to provide effectiveness at the 95% confidence level. The above Agency standards are presented in DIS/TSS-1.

Supplemental Claims

An antimicrobial agent identified as a "one-step" cleaner-disinfectant, cleaner-sanitizer, or one intended to be effective in the presence of organic soil must be tested for efficacy with an appropriate organic soil load, such as 5 percent serum. These Agency standards are presented in DIS/TSS-2. The hard water tolerance level may differ with the level of antimicrobial activity (e.g., sanitizer vs. disinfectant) claimed. To establish disinfectant efficacy in hard water, all microorganisms (i.e., bacteria, fungi, viruses) claimed to be controlled must be tested by the appropriate Recommended Method at the same hard water tolerance level. These Agency standards are presented in DIS/TSS-2.

IV COMMENTS ON THE SUBMITTED EFFICACY STUDY

1. MRID 459188-01 "Amended Report for AOAC Use-Dilution Method for Kickstart," by Kathleen A. Baxter. Study conducted at Hill Top Research, Inc. Study completion date – February 14, 2003 (Amended). HTR Study No. 01-109138-11.

This study was conducted against *Salmonella choleraesuis* (ATCC 10708) in the presence of a 5% organic soil load (horse serum). Three lots (Lot Nos. 101760, 102360, and 102960) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. All product lots were at least 60 days old at the time of testing. A 1:256 dilution of the product was prepared by adding 3.9 mL of the product to 1000 mL of 400 ppm AOAC synthetic hard water (titrated at 405 ppm). Sixty (60) stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a 48-54 hour old suspension of the test organism. The carriers then were dried for 40 minutes at 37±1°C. The dried carriers were exposed to 10 mL of the use solution for 10 minutes at 20±1°C. After exposure, the carriers were transferred into tubes containing 10 mL of Lethen Broth. After 30 minutes, the carriers were subcultured again into tubes containing Lethen Broth. All tubes were incubated at 37±1°C for 48±2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included dried carrier counts. Neutralization and toxicity evaluation controls were not conducted against *Salmonella choleraesuis*.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

Note: The laboratory report also contained efficacy data for studies conducted against *Staphylococcus aureus* and *Pseudomonas aeruginosa*. These studies are not discussed in this report, as EPA's January 29, 2003 letter did not request any further information about the studies conducted against these two microorganisms.

V RESULTS

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested			Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	Lot No. 102960	
459188-01	<i>Salmonella choleraesuis</i>	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	1.3 x 10 ⁵

VI CONCLUSIONS

1. The amended efficacy data (MRID No. 459188-01) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. The laboratory has failed to provide neutralization data demonstrating that Lethen Broth is an effective neutralizer for the product. Neutralization and toxicity evaluation data were provided against *Staphylococcus aureus* but not against *Salmonella choleraesuis*. Otherwise, no growth was observed in the subcultures of the carriers tested against three lots of the product. All three product lots tested were at least 60 days old at the time of testing. The dried carrier counts were at least 1 x 10⁴.

VII RECOMMENDATIONS

1. The proposed label claims (as supported by MRID No. 459188-01) are not acceptable regarding the use of the product, CID 2000, as a disinfectant against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. [See the Conclusions Section of this report for more details.] Prior to approving the proposed label, EPA may want to specifically request that the laboratory provide neutralization and toxicity evaluation data against *Salmonella choleraesuis*. Until adequate efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" on the proposed label is not acceptable.

2. Instructions on the EPA Data Package Record Bean Sheet requested the review of *Salmonella choleraesuis* and *Staphylococcus aureus* data. EPA has already completed its review of label claims against *Staphylococcus aureus*. EPA may want to delete reference to *Staphylococcus aureus* from the Data Review Instructions on the Bean Sheet.

January 22, 2003

MEMORANDUM

Subject: Secondary Review of Contractor's (DynCorp Systems & Solutions LLC)
Efficacy Review of CID 2000,
EPA Reg. No. 71355-E,
Case No. 069188
DP Barcode: D286206

From: Bruce H. Mann
Efficacy Evaluation Team
Product Science Branch (7510C)

To: Marshall Swindell, PM 33/Karen Leavy-Munk
Regulatory Management Team II
Antimicrobials Division (7510C)

Thru: Emily Mitchell, M.S., Team Leader
Efficacy Evaluation
Antimicrobials Division (7510C)

Applicant: NV CID LINES® SA
8900 Ieper, Belgium

Formulation Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen peroxide	26.50
Peroxyacetic acid	4.90
<u>Inert Ingredient(s)</u>	68.60
Total	100.00

I BACKGROUND

The product, CID 2000 (EPA Reg. No. 71355-E), is a new product. The applicant requested to register the product as a broad spectrum disinfectant and virucide for use on hard, non-porous, non-food contact surfaces on farms and in veterinary hospitals and food processing plants. The label claims that the product is effective in the presence of a 5% organic soil load. Studies were conducted at Southern Microbiology Associates, LLC located at 4204 Edmonton Drive in Bessemer, Alabama 35022; and Hill Top Research, Inc. located on Main and Mill Streets in Miami, Ohio 45147.

This data package contained EPA Form 8570-4 (Confidential Statement of Formula), three studies (MRID Nos. 457670-01 through 457670-03), Statements of No Data Confidentiality Claims for all three studies, and the proposed label.

Note: Correspondence from the applicant states that CID 2000 (primary name) and Kickstart (additional name) are "identical products towards chemical composition."

Note: The data package included a label for the acid-based sanitizer, CID 2000 (dated-stamped September 12, 2000 by EPA), and a label for the disinfectant, CID 2000 (date-stamped October 1, 2002 by EPA). The formulations for the two products are slightly different. The label for the acid-based sanitizer, CID 2000, appears to be irrelevant to the data package and may be a previous draft of the product label.

Note: EPA Form 8570-4 (Confidential Statement of Formula) contains Confidential Business Information. Data or information claimed by the applicant to be FIFRA confidential has not been included in this report.

II USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces such as buildings, floors, walls, ceilings, counters, animal pens/cages, vehicle items (e.g., mats, crates, cabs, wheels); feeding/drinking equipment, and handling/restraining equipment. Directions on the proposed label provided the following information regarding preparation and use of the product as a disinfectant: Prepare use solution by mixing an appropriate amount of the product with water (1:256 to treat against *Salmonella choleraesuis*, *Staphylococcus aureus*; 1:512 to treat against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis* serotype *enteritidis*; and 1:384 to treat against Infectious Bursal Disease virus and Newcastle Disease virus). Remove all animals and feed from the area. Remove all litter and manure from floors, walls, and surfaces. Empty all feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with use solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried. Before reuse, thoroughly scrub treated feeding and watering appliances with soap or detergent and rinse with potable water. Disinfect equipment by immersing equipment in use solution for 10 minutes. Allow to air dry. Fresh disinfecting solution should be made daily.

III AGENCY STANDARDS FOR PROPOSED CLAIMS

Virucides

The effectiveness of virucides against specific viruses must be supported by efficacy data that simulates, to the extent possible in the laboratory, the conditions under which the product is intended to be used. Carrier methods that are modifications of either the AOAC Use-Dilution Method (for liquid disinfectants) or the AOAC Germicidal Spray Products Test (for spray disinfectants) must be used in developing data for virucides intended for use upon dry inanimate, environmental surfaces (e.g., floors, tables, cleaned dried medical instruments). To simulate in-use conditions, the specific virus to be treated must be inoculated onto hard surfaces, allowed to dry, and then treated with the product according to the directions for use on the product label. One surface for each of two different batches of disinfectant must be tested against a recoverable virus titer of at least 10^4 from the test surface for a specified exposure period at room temperature. Then, the virus must be assayed by an appropriate virological technique, using a minimum of four determinations per each dilution assayed. Separate studies are required for each virus. The calculated viral titers must be reported with the test results. For the data to be considered acceptable, results must demonstrate complete inactivation of the virus at all dilutions. When cytotoxicity is evident, at least a 3-log reduction in titer must be demonstrated beyond the cytotoxic level. These Agency standards are presented in DIS/TSS-7.

Disinfectants for Use on Hard Surfaces (Against a Broad Spectrum of Microorganisms)

The effectiveness of disinfectants for use on hard surfaces must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). Sixty carriers must be tested with each of 3 product samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* (ATCC 10708) and *Staphylococcus aureus* (ATCC 6538). To support products labeled as "general disinfectants," killing on 59 out of 60 carriers is required to provide effectiveness at the 95% confidence level. The above Agency standards are presented in DIS/TSS-1.

Effectiveness of disinfectants against specific microorganisms other than those named in the AOAC Use-Dilution Method, AOAC Germicidal Spray Products Test, AOAC Fungicidal Test, and AOAC Tuberculocidal Activity Method, but not including viruses, must be determined by either the AOAC Use-Dilution Method or the AOAC Germicidal Spray Products Test. Ten carriers must be tested against each specific microorganism with each of 2 product samples, representing 2 different batches. To support products labeled as "disinfectants" for specific microorganisms (other than those microorganisms named in the above test methods), killing of the specific microorganism on all carriers is required. In addition, plate count data must be submitted for each microorganism to demonstrate that a concentration of at least 10^4 microorganisms survived the carrier-drying step. These Agency standards are also presented in DIS/TSS-1.

Supplemental Claims

An antimicrobial agent identified as a "one-step" cleaner-disinfectant, cleaner-sanitizer, or one intended to be effective in the presence of organic soil must be tested for efficacy with an appropriate organic soil load, such as 5 percent serum. These Agency standards are presented in DIS/TSS-2. The hard water tolerance level may differ with the level of antimicrobial activity (e.g., sanitizer vs. disinfectant) claimed. To establish disinfectant efficacy in hard water, all microorganisms (i.e., bacteria, fungi, viruses) claimed to be controlled must be tested by the

appropriate Recommended Method at the same hard water tolerance level. These Agency standards are presented in DIS/TSS-2.

IV COMMENTS ON THE SUBMITTED EFFICACY STUDIES

1. MRID 457670-01 "Virucidal Evaluation of Kick-Start for Use on Inanimate Environmental Surfaces: Test for Efficacy Against Infectious Bursal Disease Virus," by Hazel R. Bowdon. Study conducted at Southern Microbiology Associates, LLC. Study completion date – May 23, 2002.

This study was conducted against Infectious Bursal Disease virus (Strain D78, ATCC VR-2041), using chick embryo fibroblasts as the host system (source of host not indicated). Two lots (Lot Nos. 104760 and 200260) of the product, Kickstart, were tested according to the EPA Pesticide Assessment Guidelines, 1982. A use solution was prepared by diluting 1 mL of the product in 38.3 mL of 402.5 ppm hard water (a 1:384 dilution). The stock virus titer contained a 5% organic soil load (fetal bovine serum). Films of virus were prepared by spreading 0.2 mL of virus inoculum uniformly over approximately 23 to 28 cm² on the bottoms of sterile glass Petri dishes. The virus films were air-dried at 20-25°C for 20-45 minutes. For each lot of product, virus films were exposed to 2.0 mL of the use solution at 23°C. The exposure was terminated after 9.5 minutes by passage through Sephadex gel columns. This procedure lasted approximately 30 seconds, which increased the exposure to 10 minutes. The Sephadex filtered solutions were diluted serially in 1-log dilutions. Each serial dilution was added in a 0.2 mL quantity to each of 4 wells of chick embryo fibroblasts. Controls included cytotoxicity and neutralization. Viral and cytotoxicity titers were calculated by the Reed and Muench method (1938).

2. MRID 457670-02 "AOAC Use-Dilution Method" for Kickstart, by Kathleen A. Baxter. Study conducted at Hill Top Research, Inc. Study completion date – November 20, 2001

This study was conducted against *Staphylococcus aureus* (ATCC 6538), *Salmonella choleraesuis* (ATCC 10708), and *Pseudomonas aeruginosa* (ATCC 15442). Three lots (Lot Nos. 101760, 102360, and 102960) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. The product was tested in the presence of a 5% organic soil load (horse serum). All product lots were at least 60 days old at the time of testing with one exception; it is unconfirmed whether at least one of the product lots tested against *Pseudomonas aeruginosa* (at a 1:512 dilution) was at least 60 days old at the time of testing. A 1:256 dilution of the product (using 400±10 ppm AOAC synthetic hard water (titrated value not indicated)) was tested against *Staphylococcus aureus* and *Salmonella choleraesuis*. A 1:384 and 1:512 dilution of the product (using 400±10 ppm AOAC synthetic hard water (titrated value not indicated)) was tested against *Pseudomonas aeruginosa*. Polished stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a 48-54 hour old suspension of the test organism. The carriers then were dried for 40 minutes at 37±1°C. The carriers were exposed to 10 mL of the use solution for 10 minutes at 20±1°C. After exposure, the carriers were transferred into tubes containing 10 mL of Letheen Broth. After 30 minutes, the carriers were subcultured again into tubes containing Letheen Broth. All tubes were incubated at 37±1°C for 48±2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included phenol resistance, neutralization evaluation, cytotoxicity, and dried carrier counts.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

3. MRID 457670-03 "AOAC Use-Dilution Method" for Kickstart, by Kathleen A. Baxter. Study conducted at Hill Top Research, Incorporated. Study completion date – February 1, 2002.

This study was conducted against *Escherichia coli* (ATCC 11229), *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), and *Salmonella choleraesuis*, serotype *enteritidis* (ATCC 13076). Two lots (Lot Nos. 101760 and 102360) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. The product was tested at a 1:512 dilution in 400±10 ppm AOAC synthetic hard water (titrated value not indicated) in the presence of a 5% organic soil load (horse serum). Ten polished stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a suspension of the test organism. The carriers then were dried for 40 minutes at 37±1°C. The carriers were exposed to 10 mL of the use solution for 10 minutes at 20±1°C. After exposure, the carriers were transferred into tubes containing 10 mL of Lethen Broth (for *Escherichia coli* and *Salmonella choleraesuis*, serotype *enteritidis*), Brain Heart Infusion Broth (for *Listeria monocytogenes*), or Mycoplasma Medium (for *Mycoplasma gallinarum*). After 30 minutes, the carriers were subcultured again into tubes containing neutralizing medium. All tubes were incubated at 37±1°C for 48±2 hours except tubes containing *Mycoplasma gallinarum* which were incubated at 37±1°C with 5% CO₂ for 48±2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included phenol resistance, neutralization evaluation, cytotoxicity, and dried carrier counts.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

V RESULTS

MRID	Organism	Results			Dried Virus Control (TCID ₅₀ /0.2 mL)
			Lot No. 104760	Lot No. 200260	
457670-01	Infectious Bursal Disease virus (Strain D78, VR-2041)	10 ⁻¹ and 10 ⁻² dilution	Cytotoxicity present	Cytotoxicity present	5.5
		10 ⁻³ to 10 ⁻⁶ dilution	Complete inactivation	Complete inactivation	
		TCID ₅₀ /0.2 mL	≤2.5	≤2.5	
		Log reduction	≥3.0	≥3.0	

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested			Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	Lot No. 102960	
457670-02	<i>Staphylococcus aureus</i>	1° - 1/60 2° - 0/60	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	7.4×10^6
457670-02	<i>Pseudomonas aeruginosa</i> 1:512 in 400 ppm	1° - 2/60 2° - 3/60	1° - 1/60 2° - 3/60	1° - 2/60 2° - 2/60	5.2×10^6
	1:384 in 405 ppm	1° - 1/60 2° - 2/60	1° - 1/60 2° - 1/60	1° - 0/60 2° - 3/60	8.2×10^6
457670-02	<i>Salmonella choleraesuis</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.3×10^6

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested		Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	
457670-03	<i>Escherichia coli</i>	1° - 10/10 2° - 10/10	1° - 10/10 2° - 10/10	2.2×10^7
	<i>Listeria monocytogenes</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.6×10^6
	<i>Mycoplasma gallinarum</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	6.8×10^5
	<i>Salmonella choleraesuis</i> , serotype enteritidis	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.5×10^6

VI CONCLUSIONS

1. The submitted efficacy data (MRID No. 457670-01) support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with virucidal activity when tested against Infectious Bursal Disease virus (Strain D78, ATCC VR-2041) on hard, non-porous surfaces in the presence of a 5% organic soil load (fetal bovine serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:384 dilution. Cytotoxicity was observed at the 10^{-1} to 10^{-2} dilutions. Complete inactivation (no growth) was observed in the 10^{-3} to 10^{-6} dilutions. A 3-log reduction in titer was demonstrated beyond the cytotoxic level. The recoverable virus titer was at least 10^4 .

2. The submitted efficacy data (MRID No. 457670-02) support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when

tested against *Staphylococcus aureus* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least 59 of 60 carriers for each product lot tested. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 . The neutralization evaluation control showed positive growth.

3. The submitted efficacy data (MRID No. 457670-02) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least all 10 carriers tested; however, DIS/TSS-1 requires testing of 60 carriers. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 . The neutralization confirmation control showed positive growth against *Staphylococcus aureus*.

Note: The laboratory may have incorrectly reported the number of carriers tested. The test summary results [page 7 of the MRID] indicated 60 carriers were tested for *Salmonella choleraesuis*, and test procedures [page 27 of the MRID] called for testing of 60 carriers. However, the Report Form [page 9 of the MRID] indicates that 10 carriers were tested.

4. The submitted efficacy data (MRID No. 457670-02) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Pseudomonas aeruginosa* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a dilution of 1:384 or 1:512. The product was not effective on at least 59 of 60 carriers for the product lots tested.

5. The submitted efficacy data (MRID No. 457670-03) appear to support the use of the product, CID 2000 (primary name) or Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis*, serotype *enteritidis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:512 dilution. The product was effective on 10 of 10 carriers for each product lot tested. The dried carrier counts were above 1×10^4 , as required. The neutralization effectiveness control showed positive growth against *Mycoplasma gallinarum*.

6. The submitted efficacy data (MRID No. 457670-03) do not support the use of product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Escherichia coli* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot.

VII RECOMMENDATIONS

1. The proposed label claims are acceptable regarding the use of the product, CID 2002 (primary name) and Kickstart (additional name), as a disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes:

<u>Organisms</u>	<u>Dilution</u>	<u>MRID No.</u>
Infectious Bursal Disease virus (Strain D78, ATCC VR-2041)	1:384	MRID No. 457670-01
<i>Listeria monocytogenes</i>	1:512	MRID No. 457670-03
<i>Mycoplasma gallinarum</i>	1:512	MRID No. 457670-03
<i>Salmonella choleraesuis</i> , serotype <i>enteritidis</i>	1:512	MRID No. 457670-03
<i>Staphylococcus aureus</i>	1:256	MRID No. 457670-02

2. The proposed label claims (as supported by MRID No. 457670-02) are not acceptable regarding the use of the product, CID 2002 (primary name) and Kickstart (additional name), as a disinfectant against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. The applicant needs to provide the Agency with a clarification by or from the laboratory as to whether 10 or 60 carriers were tested in this study. If 60 carriers were tested, then, the applicant needs to provide the Agency additional data that will demonstrate neutralization against *Salmonella choleraesuis*. If 60 carriers were not tested, then proposed label claims regarding *Salmonella choleraesuis* and product use as a broad-spectrum disinfectant need to be removed from the label. Adequate and acceptable efficacy must be generated and submitted for an efficacy determination (refer to item (b) of DIS/TSS-1 enclosure for efficacy requirements).

Until adequate efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" at the top of page #1 is considered unacceptable. The indicated label comments are applicable for the proposed label "CID 2000" pinpunched 10-01-2002.

3. Efficacy data submitted for the following microorganisms do not support effectiveness of the product at a 10 minute contact time in the presence of a 5% organic soil load. Eventhough, the proposed label does not include label claims for these microorganisms, a listing of the proposed test microorganisms is considered unacceptable. Until adequate efficacy data are submitted in support of effectiveness against *Pseudomonas aeruginosa*, the proposed label claim for veterinary hospitals is considered unacceptable. The comment is applicable for page #3 on the proposed label "CID 2000" pinpunched 10-01-2002.

- *Pseudomonas aeruginosa*, as supported by MRID No. 457670-02
- *Escherichia coli*, as supported by MRID No. 457670-03

4. The proposed label includes claims of product efficacy against Newcastle Disease virus at a 1:384 dilution. The submitted data package provided to the Agency do not include any efficacy studies in support of this proposed label claim. Therefore, the proposed label claim against the microorganism, New Castle Disease virus, is unacceptable and must be removed from the product proposed label "CID 2000", pinpunched 10-01-2002.

DATA PACKAGE BEAN SHEET

Date: 05-Oct-2004

Page 1 of 2

***** Registration Information *****

Registration: 71355-E - CID 2000

Company: 71355 - CID LINES N.V.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# CM-2 308H

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date: 16-Sep-2004

Calculated Due Date: 14-Jan-2005

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (188) ADDITIONAL USE;NEW REGISTRATION;OLD INGREDIENT;ME-TDO;

Ingredients: 000595, Hydrogen peroxide(20%)

***** Data Package Information *****Expedite: ☐ Yes ☒ No

Date Sent: 05-Oct-2004

Due Back:

DP Ingredient: 000595, Hydrogen peroxide

DP Title:

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #:

Assigned To**Date In****Date Out**

Organization: AD / PSB

10/6/04

Administrative Due Date: 08-Jan-2005

Team Name: EET

10/6/04

Negotiated Due Date: 12/14/04

Reviewer Name: Marcie

12/06/04

12/03/04

Projected Completion Date: 11/30/04

Contractor Name:

***** Studies Sent for Review *****

No Studies

***** Additional Data Package for this Decision *****

Printed on Page 2

***** Data Package Instructions *****PLEASE REVIEW THE SUBMITTED AOAC USE DILUTION TEST AND PROPOSED LABELING
ADMIN DUE DATE 01/14/05, ETT DUE DATE 12/14/04, ACTION CODE 188, FOQA

SUBMISSION BAR CODE # 56353-36 REVIEWER K. Leavy-MunkCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 189DESCRIPTOR Efficacy Data

☐ CHILD RESISTANT PACKAGING: ☐ CERTIFICATION
☐ NON-RESIDENTIAL USE ONLY
☐ NOT APPLICABLE

REGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONALPROPOSED CLASSIFICATION: ☐ GENERAL ☐ RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

04 21 0304 21 0304 23 03

METHOD OF SUPPORT

FORMULATORS' EXEMPTION

☐ CITE ALL
☐ SELECTIVE
☐ NOT SUBMITTED
☐ NOT APPLICABLE
☐ INCORRECT/RESUB

☐ SUBMITTED
☐ NOT SUBMITTED
☐ NOT APPLICABLE
☐ INCORRECT/RESUB

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY

EFFICACY

TOXICOLOGY

HED TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER

STATUS

RESPONSE CODE 13

RESPONSE DATE

AUG 13 2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 15 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Olivia Laird
Agent for,
NV CID Lines SA
501 South Lincoln Avenue
Sterling, VA 20164-2024

Subject: CID 2000
EPA File Symbol 71355-E
Your Submission Dated April 21st, 2003
EPA Received Date April 21st, 2003

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable for the following reasons:

The amended efficacy data (MRID No. 459188-01) do not support the use of the product, CID 2000 (primary name) and Kick start (additional brand name), as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. The laboratory has failed to provide neutralization data demonstrating that Lethen Broth is an effective neutralizer for the product. Neutralization and toxicity evaluation data were provided against *Staphylococcus aureus* but not against *Salmonella choleraesuis*. Otherwise, no growth was observed in the subcultures of the carriers tested against three lots of the product. All three product lots tested against three lots of the product. All three product lots tested were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 .

The proposed label claims (MRID No. 459188-01) are not acceptable regarding the use of the product, CID 2000, as a disinfectant against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution.

Provide neutralization and toxicity evaluation data against *Salmonella choleraesuis*. Until adequate efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase, "broad spectrum disinfectant" on the proposed label is not acceptable.

All DIS/TSS that are referenced in this efficacy review can be retrieved from the following internet address: <http://acc.edu/info/main/distss.htm>.

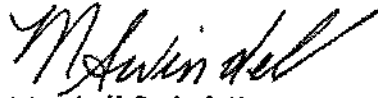
A copy of the complete efficacy review is enclosed for your review.

The product may not be lawfully distributed in interstate commerce until it is registered.

The Agency reserves a full label review until the above discrepancies have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in black ink, appearing to read "Marshall Swindell". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division(7510C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 16, 2003

MEMORANDUM:

Subject: Efficacy Review for EPA Reg. No.: 71355-E, "CID 2000"
DP Barcode: D290087
Case No: 069188

From: Emily Mitchell, M.S., Team Leader *Emily Mitchell 7/16/03*
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

To: Marshall Swindell PM33/Karen Leavy-Munk
Regulatory Management Branch I
Antimicrobials Division (7510C)

Applicant: NV CID Lines SA
Waterpoortstraat 2 B 8900 Ieper
Belgium-Europe

Formulation From Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen peroxide.....	26.5%
Peroxyacetic acid.....	4.9%
<u>Inert Ingredient(s)</u>	<u>68.6%</u>
Total	100.0%

I BACKGROUND

The product, CID 2000 (EPA Reg. No. 71355-E), is a new product. The applicant requested to register the product as a broad spectrum disinfectant (bactericide, virucide) for use on hard, non-porous, non-food contact surfaces on farms and in veterinary hospitals and food processing plants. The label claims that the product is effective in the presence of "400 ppm AOAC synthetic hard water with 5% soil load." This data package is a re-submission of information in response to an EPA letter dated January 29, 2003. In its letter, EPA notified the applicant's representative that the submitted efficacy data did not support the use of the product against *Salmonella choleraesuis*. EPA requested clarification of whether 10 or 60 carriers were tested in the study against *Salmonella choleraesuis*. In addition, EPA requested additional data demonstrating effectiveness of the neutralizer against *Salmonella choleraesuis* if 60 carriers were tested. The applicant submitted amended efficacy data for the study against *Salmonella choleraesuis*. The study was conducted at Hill Top Research, Inc., located on Main and Mill Streets, Miamiville, OH 45147.

This data package contained a copy of an EPA letter to the applicant's representative (dated January 29, 2003), EPA Form 8570-4 (Confidential Statement of Formula), one study (MRID No. 459188-01), Statements of No Data Confidentiality Claim for the study, and the proposed label (pin-punched 10/1/02, by EPA).

Note: The data package also included a label for the acid-based sanitizer, CID 2000 (pin-punched 9/12/00, by EPA). The label for the acid-based sanitizer, CID 2000, appears to be irrelevant to the data package and may be a previous draft of the product label.

Note: Information in the data package indicates that Kickstart is an alternate reference name for the product, CID 2000.

Note: EPA Form 8570-4 (Confidential Statement of Formula) contains Confidential Business Information. Data or information claimed by the applicant to be FIFRA confidential has not been included in this report.

II USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces such as buildings, floors, walls, ceilings, counters, animal pens/cages, vehicle items (e.g., mats, crates, cabs, wheels), feeding/drinking equipment, and handling/restraining equipment. Directions on the proposed label provided the following information regarding preparation and use of the product as a disinfectant: Prepare use solution by mixing an appropriate amount of the product with water (1:256 to treat *Salmonella choleraesuis*). Remove all animals and feed from the area. Remove all litter and manure from floors, walls, and surfaces. Empty all feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with the use solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried. Before reuse, thoroughly scrub treated feeding and watering appliances with soap or detergent and

rinse with potable water. Disinfect equipment by immersing equipment in use solution for 10 minutes. Allow to air dry. Fresh disinfecting solution should be made daily.

III AGENCY STANDARDS FOR PROPOSED CLAIMS

Disinfectants for Use on Hard Surfaces (Against a Broad Spectrum of Microorganisms)

The effectiveness of disinfectants for use on hard surfaces must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). Sixty carriers must be tested with each of 3 product samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* (ATCC 10708) and *Staphylococcus aureus* (ATCC 6538). To support products labeled as "general disinfectants," killing on 59 out of 60 carriers is required to provide effectiveness at the 95% confidence level. The above Agency standards are presented in DIS/TSS-1.

Supplemental Claims

An antimicrobial agent identified as a "one-step" cleaner-disinfectant, cleaner-sanitizer, or one intended to be effective in the presence of organic soil must be tested for efficacy with an appropriate organic soil load, such as 5 percent serum. These Agency standards are presented in DIS/TSS-2. The hard water tolerance level may differ with the level of antimicrobial activity (e.g., sanitizer vs. disinfectant) claimed. To establish disinfectant efficacy in hard water, all microorganisms (i.e., bacteria, fungi, viruses) claimed to be controlled must be tested by the appropriate Recommended Method at the same hard water tolerance level. These Agency standards are presented in DIS/TSS-2.

IV COMMENTS ON THE SUBMITTED EFFICACY STUDY

1. MRID 459188-01 "Amended Report for AOAC Use-Dilution Method for Kickstart," by Kathleen A. Baxter. Study conducted at Hill Top Research, Inc. Study completion date – February 14, 2003 (Amended). HTR Study No. 01-109138-11.

This study was conducted against *Salmonella choleraesuis* (ATCC 10708) in the presence of a 5% organic soil load (horse serum). Three lots (Lot Nos. 101760, 102360, and 102960) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. All product lots were at least 60 days old at the time of testing. A 1:256 dilution of the product was prepared by adding 3.9 mL of the product to 1000 mL of 400 ppm AOAC synthetic hard water (titrated at 405 ppm). Sixty (60) stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a 48-54 hour old suspension of the test organism. The carriers then were dried for 40 minutes at 37±1°C. The dried carriers were exposed to 10 mL of the use solution for 10 minutes at 20±1°C. After exposure, the carriers were transferred into tubes containing 10 mL of Letheen Broth. After 30 minutes, the carriers were subcultured again into tubes containing Letheen Broth. All tubes were incubated at 37±1°C for 48±2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included dried carrier counts. Neutralization and toxicity evaluation controls were not conducted against *Salmonella choleraesuis*.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

Note: The laboratory report also contained efficacy data for studies conducted against *Staphylococcus aureus* and *Pseudomonas aeruginosa*. These studies are not discussed in this report, as EPA's January 29, 2003 letter did not request any further information about the studies conducted against these two microorganisms.

V RESULTS

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested			Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	Lot No. 102960	
459188-01	<i>Salmonella choleraesuis</i>	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	1.3×10^6

VI CONCLUSIONS

1. The amended efficacy data (MRID No. 459188-01) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. The laboratory has failed to provide neutralization data demonstrating that Lethen Broth is an effective neutralizer for the product. Neutralization and toxicity evaluation data were provided against *Staphylococcus aureus* but not against *Salmonella choleraesuis*. Otherwise, no growth was observed in the subcultures of the carriers tested against three lots of the product. All three product lots tested were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 .

VII RECOMMENDATIONS

1. The proposed label claims (as supported by MRID No. 459188-01) are not acceptable regarding the use of the product, CID 2000, as a disinfectant against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. [See the Conclusions Section of this report for more details.] Prior to approving the proposed label, EPA may want to specifically request that the laboratory provide neutralization and toxicity evaluation data against *Salmonella choleraesuis*. Until adequate efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" on the proposed label is not acceptable.

2. Instructions on the EPA Data Package Record Bean Sheet requested the review of *Salmonella choleraesuis* and *Staphylococcus aureus* data. EPA has already completed its review of label claims against *Staphylococcus aureus*. EPA may want to delete reference to *Staphylococcus aureus* from the Data Review Instructions on the Bean Sheet.

CID 2000

CID 2000 is a peracetic acid-based sanitizer developed for the cleaning and decontamination of drinking water systems for :

1. *broilers and layers*
2. *turkeys*
3. *pigs*

Active ingredients :

Peracetic acid

5 % (by wt)

Hydrogen peroxide

20 %

Inert ingredients

75 %

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No :
EPA Establishment No : 71355-BEL-001

Batch No : see top of bottle
Expiry Date : see top of bottle

MANUFACTURED BY:

CID LINES

THE PROFESSIONAL HYGIENE COMPANY

Waterpoortstraat 2 - B 8900 IEPER

BELGIUM - EUROPE

Phone : 011 32 57 217877 - Fax : 011 32 57 217879

Website : <http://www.cidlines.be> - e-mail : cidlines@cidlines.be

Net contents : 1 gal

09

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

9 12 00

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS :

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible, however, at temperatures exceeding 158°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

000

DIRECTIONS FOR USE :

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling

1000

CID 2000 peracetic acid sanitizer is recommended for use in drinking water systems as a cleaning agent of the entire drinking water system (pipelines, nipples, bell-drinkers, ...) between the flocks, and as a drinking water sanitizer during production.

CID 2000 is effective against bacteria and fungi and prevents formation of slimes during production.

1. Cleaning of drinking water systems :

Between the flocks : let circulate a 1:50 solution of CID 2000. Use circulation techniques as appropriate to the equipment. All surfaces should be exposed to the sanitizing solution for a period of 4-6 hours. Drain thoroughly and rinse with potable water until clear water comes out of the drinking water system. Repeat treatment as required to maintain control.

2. For acidification and decontamination of the drinking water during production :

Use CID 2000 at a dilution of 1:2500 to 1:3000 during 2 to 3 days a week every other day, or in delicate periods 3 to 4 consecutive days. Use circulation techniques as appropriate to the equipment.

Stop adding CID 2000 24 hours before vaccination and medical treatments.

REMARK :

Use CID 2000 with pumps fully made out of Teflon® (if not possible : make a 1:100 pre-dilution before passing the pump)

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :

HYDROGEN PEROXIDE
PEROXYACETIC ACID

26.5%

4.9%

Inert ingredients

68.6%

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Caution: do not use for food or food contact surfaces. Statements

CID 2000 is effective against :

- Bacteria : *Salmonella Choleraesuis* (ATCC 10705), *Staphylococcus aureus* (ATCC 6538) in a dilution of 1 : 256 in 400ppm AOAC synthetic hard water with 5% soil load, *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), *Salmonella Choleraesuis serotype enteritidis* (ATCC 13076) in a dilution of 1 : 512 in 400ppm AOAC synthetic hard water with 5% soil load
- Virus : *Infectious Bursal Disease of Chickens* (ATCC D75 VN-2041), *Newcastle Disease* (Spoxas strain 539016) in a dilution of 1 : 994 in 400ppm AOAC synthetic hard water with 5% soil load

EPA Reg. N° 71355-

NET CONTENTS : 1 - 5 gallons

BATCH N°

EPA Est. N° 71355-BEL-001

EXPIRY DATE

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment.

1. Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)
2. Hatchers, Sotters, and chick processing facilities
3. Food processing plants (slaughterhouses)
4. Trays, racks, carts, chick boxes, cages and other hard surfaces
5. Trucks and other vehicles
6. Veterinary hospitals

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

CID LINES
THE PROFESSIONAL HYGIENE COMPANY

NV CID LINES SA - Waterpoortstraat 2
8900 IEPER - BELGIUM - EUROPE
Tel: 011 32 51 217677
Fax: 011 32 51 217679
E-mail: info@cidlines.be

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible, however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labelling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanized and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.

2. Hatcheries :

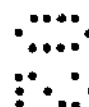
Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room and carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying

CID LINES
THE PROFESSIONAL HYGIENE COMPANY

NV CID LINES SA - Waterpoortstraat 2
8900 IEPER - BELGIUM - EUROPE
tel 011 32 51 217877
fax 011 32 51 217879
e-mail cidlines@cidlines.be



the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

5. Veterinary hospitals :

For disinfection of the following hard non-porous surfaces : floors, walls, ceilings, counters, cages, feeding/drinking equipment, and handling/restraining equipment. Remove animals and feed from the premises. Clean all surfaces if visibly soiled. Saturate surfaces with the disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house livestock or employ equipment until surfaces have been absorbed or dried. Thoroughly scrub treated feeding and watering equipment with soap or detergent and rinse with potable water before reuse. Fresh disinfecting solution should be made daily or if visibly soiled.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal.

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.


Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label, (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

CID LINES
THE PROFESSIONAL HYGIENE COMPANY

NV CID LINES SA - Waterpoortstraat 2
2900 IEPER - BELGIUM - EUROPE
tel 011 32 57 21 87 77
fax 011 32 57 21 87 79
e-mail cidlines@cidlines.be


HILL TOP RESEARCH, INC.
MAIN AND MILL STREETS
MIAMIVILLE, OHIO 45147

PROTOCOL DEVIATION # 1 AOAC Use-Dilution Method

HTR STUDY NO.: 01-109138-11

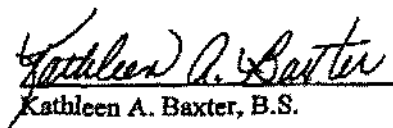
SPONSOR & ADDRESS: CID LINES®
Waterpoortstraat 2
8900 Ieper, Belgium

SPONSOR'S REPRESENTATIVE: Vincent Catry

PROTOCOL DEVIATION:

The hard water prepared on September 13, 2001 was 0.11 pH units below the specification. In the opinion of the Study Director, the deviation did not have an adverse effect on the outcome of the study.

APPROVED FOR: HILL TOP RESEARCH, INC.

BY:  11.20.01
Kathleen A. Baxter, B.S. Date
Study Director
Microbiological Services Division

TRANSMITTAL DOCUMENT**1. NAME AND ADDRESS OF SUBMITTER & SPONSOR****SUBMITTER**

**LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVENUE
STERLING, VIRGINIA 20164-2024**

SPONSOR

**NV CID LINES S.A.
WATERPOORTSTRAAT 2
8900 IEPER, BELGIUM**

2. REGULATORY ACTION TO BE TAKEN

Submission of Additional Efficacy Data

EPA FILE SYMBOL/REG. NO.: 71355-E

PRODUCT NAME: CID 2000(primary name)/Kickstart(additional name)

PM 31

TRANSMITTAL DATE

April 21, 2003

3. LIST OF SUMMITTED STUDIES

Volume 1: Efficacy-AOAC Use-Dilution Method , HTR Study #01-109138-11 45918801

COMPANY OFFICIAL: *Vincent Catry* for VINCENT CATRY

COMPANY CONTACT: OLIVIA D. LAIRD

Phone: (703) 471-6590

FAX: (703) 471-6269



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 29 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Olivia Laird
CID Lines
c/o Laird's Regulatory Consultants
501 South Lincoln Avenue
Sterling, VA 20164-2024

Subject: CID 2000
EPA File Symbol 71355-E
Your Application Dated September 27th, 2002
EPA Received Date October 1st, 2002

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable for the following reasons:

The submitted efficacy data(MRID No. 457670-02) do not support the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least all 10 carriers tested;however, DIS/TSS-1 requires testing of 60 carriers. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least at 1×10^7 . The neutralization confirmation control showed positive growth against *Staphylococcus aureus*.

Please note: The laboratory may have incorrectly reported the number of carriers tested. The test summary results (page 7 of the MRID) indicated 60 carriers were tested for *Salmonella choleraesuis*, and test procedures (page 27 of the MRID)called for testing of 60 carriers. However, the Report Form(page 9 of the MRID) indicates that 10 carriers were tested.

The submitted efficacy data (MRID No. 457670-02) do not support the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Pseudomonas aeruginosa* on hard, non-porous surfaces in the persence of a 5% organic soil load(horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a dilution of 1:38 or 1:512. The product was not effective on at least 59 of 60 carriers for the product lots tested.

The submitted efficacy data(MRID No. 457670-03) do not support the use of product, CID 2000, as a disinfectant with bactericidal activity when tested against *Escherichia coli* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot.

Acceptable Data

The submitted efficacy data(MRID No. 457670-010)supports the use of the product, CID 2000, as a disinfectant with virucidal activity when tested against *Infectious Bursal Disease virus*(strain D78, ATCC VR-2041) on hard, non-porous hard surfaces in the presence of a 5% organic soil load (fetal bovine serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:384 dilution. Cytotoxicity was observed at the 10^{-4} to 10^{-5} dilutions.

The submitted efficacy data(MRID No. 457670-02) supports the use of the product, CID 2000, with bactericidal activity when tested against *Staphylococcus aureus* on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on least 59 of 60 carriers for each product lot tested. All three product lots were at neutralization evaluation control showed positive growth.

The submitted efficacy data(MRID No. 457670-03) appear to support the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis*, serotype enteritidis on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard water for a contact time of 10 minutes at 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot. The dried carrier counts were above 1×10^4 , as required. The neutralization effectiveness control showed positive growth against *Mycoplasma gallinarum*.

Labeling

The proposed label claims(as supported by MRID No. 457670-02) are not acceptable regarding the use of the product, CID 2000, as a disinfectant against *Samonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. Provide the Agency with a clarification by or from the laboratory as to whether 10 or 60 carriers were tested in this study. If 60 carriers were tested, then provide the Agency additional data that will demonstrate neutralization against *Salmonella choleraesuis*. If 60 carriers were not tested, then the proposed label claims regarding *Salmonella choleraesuis* and product use as a "broad spectrum disinfectant" needs to be removed from the label. Adequate and acceptable efficacy data must be generated and submitted for an efficacy determination(refer to item(b)) of DIS/TSS-1 enclosure requirements.

Until adequate and acceptable efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" at the top of page #1 is considered unacceptable. The indicated label comments are applicable for the proposed label, CID 2000, pinpunched 10-01-2002.

However, the proposed label claims are acceptable regarding the use of the product, CID 2000, as a disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes.

<u>Organisms</u>	<u>Dilution</u>	<u>MRID No.</u>
Infectious Bursal Disease virus (Strain D78, ATCC VR-20410)	1:384	MRID No. 457670-01
Listeria monocytogenes	1:512	MRID No. 457670-03
Mycoplasma gallinarum	1:512	MRID No. 457670-03
Salmonella choleraesuis	1:512	MRID No. 457670-03
Staphylococcus aureus	1:256	MRID No. 457670-02

Revise the First Aid statements as per PR Notice 2001-1.

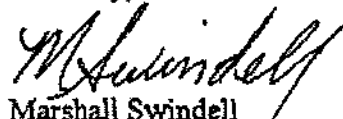
A complete copy of the science review is enclosed for your records.

The product may not be lawfully distributed in interstate commerce until it is registered.

The Agency reserves a full label review until the above discrepancy have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

TRANSMITTAL DOCUMENT**1. NAME AND ADDRESS OF SUBMITTER & SPONSOR****SUBMITTER**

**LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVENUE
STERLING, VIRGINIA 20164-2024**

SPONSOR

**NV CID LINES S.A.
WATERPOORTSTRAAT 2
8900 IEPER, BELGIUM**

2. REGULATORY ACTION TO BE TAKEN

Submission of Additional Efficacy Data

EPA FILE SYMBOL/REG. NO.: 71355-E

PRODUCT NAME: CID 2000(primary name)/Kickstart(additional name)

PM 31

TRANSMITTAL DATE

April 21, 2003

3. LIST OF SUMMITTED STUDIES

Volume 1: Efficacy-AOAC Use-Dilution Method, HTR Study #01-109138-11 45918801

COMPANY OFFICIAL: *Vincent Catry* for VINCENT CATRY

COMPANY CONTACT: OLIVIA D. LAIRD

Phone: (703) 471-6590

FAX: (703) 471-6269

DP BARCODE: D290087

CASE: 069188
SUBMISSION: S635336DATA PACKAGE RECORD
BEAN SHEETDATE: 05/16/03
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
 CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
 COMPANY: 071355 CID LINES N.V.
 PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
 PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
 RECEIVED DATE: 04/21/03 DUE OUT DATE: 08/19/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 290087 EXPEDITE: N DATE SENT: 05/16/03 DATE RET.: / /
 CHEMICAL: 000595 Hydrogen peroxide
 DP TYPE: 001

ASSIGNED TO	CSF: Y	DATE IN	LABEL: Y	DATE OUT	ADMIN DUE DATE: 08/19/03
DIV : AD		5/23/03		/ /	NEGOT DATE: 7/19/03
BRAN: PSB		5/23/03		/ /	PROJ DATE: 7/19/03
SECT: EET		5/23/03		/ /	
REVR :		/ /		/ /	
CONTR: <i>dyndup</i>		/ /		/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review attached data (MRID #45918801) (Staph & Salmonella) for acceptability.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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SUBMISSION BAR CODE # 5632841REVIEWER KL Fish

FOPA

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 189DESCRIPTOR Corrected Efficacy Study + Revised Label

☐ CHILD RESISTANT PACKAGING: ☐ CERTIFICATION
☐ NON-RESIDENTIAL USE ONLY
☐ NOT APPLICABLE

REGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONALPROPOSED CLASSIFICATION: ☐ GENERAL ☐ RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

03	17	03
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03	21	03
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03	24	03
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~~METHOD OF SUPPORT~~~~FORMULATORS' EXEMPTION~~

☐ CITE ALL
☐ SELECTIVE
☐ NOT SUBMITTED
☐ NOT APPLICABLE
☐ INCORRECT/RESUB

☐ SUBMITTED
☐ NOT SUBMITTED
☐ NOT APPLICABLE
☐ INCORRECT/RESUB

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNS

CHEMISTRY

EFFICACY

TOXICOLOGY

HED TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER

STATUS

Rejected Study returned to registrant
for information (KL)

RESPONSE CODE

38

RESPONSE DATE

5/1/03

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER & SPONSOR

SUBMITTER

LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVENUE
STERLING, VIRGINIA 20164-2024

SPONSOR

NV CID LINES S.A.
WATERPOORTSTRAAT 2
8900 IEPER, BELGIUM

2. REGULATORY ACTION TO BE TAKEN

Submission of Additional Efficacy Data

EPA FILE SYMBOL/REG. NO.: 71355-E

PRODUCT NAME: CID 2000(primary name)/Kickstart(additional name)

TRANSMITTAL DATE

March 17, 2003

3. LIST OF SUMMITTED STUDIES

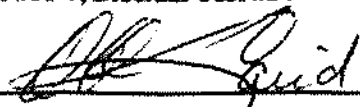
Volume 1: Administrative Materials

ject (02) Volume 2: Efficacy-AOAC Use-Dilution Method , HTR Study #01-109138-11

45885701 Volume 3: Efficacy-AOAC Use-Dilution Method, HTR Study #02-120838-106

45885702 Volume 4: Efficacy-Virucidal Evaluation of Kick-Start Against Avian Reovirus in a
Suspension Assay, Project No. 01-7, Biocidal Test #59

45885703 Volume 5: Efficacy Virucidal Evaluation of Kick-start for Use on Inanimate
Environmental surfaces: Test for Efficacy Against Newcastle Disease
Virus, Project #01-7, Biocidal Test #54

COMPANY OFFICIAL: for  VINCENT CATRY

COMPANY CONTACT: OLIVIA D. LAIRD

Phone: (703) 471-6590

FAX: (703) 471-6269

Volume 1

MAR 28 2009

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

CID LINES
C/O OLIVIA D. LAIRD
501 SOUTH LINCOLN AVENUE
STERLING, VA 20164

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 03/21/03. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [02] :

* Each study which contains a claim of confidentiality under FIFRA 10(d)(1)(A), (B) or (C) must be prepared with a releasable part of the study as well as a confidential attachment. The releasable part of the study must contain a title page, confidentiality claim statement, any data not protected by the above mentioned FIFRA section and cross reference(s) to protected data which can be found in the confidential attachment. See p. 8 of PR Notice 86-5.

458857-00

To the attention of Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division (7505C)

leper, March 12th, 2003

Dear Mr. Swindell,

Referring to your letter dated Jan 29, 2003 with subject Application for EPA registration CID 2000, we send attached the following documents and comments :

The submitted efficacy data (MRID N° 457670-02) was found to be incorrectly reported.

After contact with Hilltop Research, the laboratory which performed the test, they amended the report to correct the amount of carriers used in the test. Concerning the issue of neutralization control we received following comments from Hilltop :

Quote :

"With respect to neutralizer effectiveness testing, there is no EPA requirement for neutralizer effectiveness against each organism you test. The requirement is for you to show that your neutralizer has effectively inactivated the antimicrobial in question in the test. The requirement is to either conduct secondary transfers to demonstrate that the antimicrobial effects were overcome or to demonstrate that your subculture medium (AOAC Letheen Broth) was capable of supporting microbial growth after it has been exposed to your test substance (Kickstart).

You fulfilled both of these requirements. ALL testing against all organisms had both primary and secondary transfers with AOAC Letheen Broth. In addition, a neutralization evaluation was conducted (Appendix I of your report) that shows after insulting both the primary and secondary subcultures of Letheen Broth with your product, they were still able to support the growth of bacteria. There is no reason to expect that this would not work equally as well with salmonella choleraesuis as it did with Staphylococcus aureus as the whole purpose of this experiment is to show that the antimicrobial agent has been inactivated prior to the addition of the test organism."

End of quote

In addition to this amended report we also attached the efficacy reports against Escherichia Coli, Avian Reovirus and Newcastle Disease virus.

Further to the request of the EPA, we also revised the label as per PR Notice 2001-1.

Attached are 5 revised original labels.

Yours sincerely,



Vincent Catry
CID LINES Regulatory Affairs,

This is an ACCEPTED submission

This is a PARTIALLY ACCEPTED/COMPLETELY REJECTED submission

[~~PK~~-188]

Al - place into PRAT & Return rejected data to Olivia Laird.

- Give the rest of the pkg to ^{KL}Tony.

Tony - check the pathogens c Michelle Wingfield
~~my~~

COVER PAGE

CID 2000
EPA FILE SYMBOL -71355-E

ADMINISTRATIVE MATERIALS

VOLUME I

3
5
5
3

TABLE OF CONTENTS

1. Transmittal Document
2. Transmittal Letter With Explanation From Lab.
3. Five copies of the proposed label

2025
2025
2025
2025
2025

DP BARCODE: D290087

CASE: 069188
SUBMISSION: S635336DATA PACKAGE RECORD
BEAN SHEETDATE: 05/16/03
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
COMPANY: 071355 CID LINES N.V.
PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
RECEIVED DATE: 04/21/03 DUE OUT DATE: 08/19/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 290087 EXPEDITE: N DATE SENT: 05/16/03 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
DP TYPE: 001

	CSF: Y		LABEL: Y	
ASSIGNED TO		DATE IN	DATE OUT	ADMIN DUE DATE: 08/19/03
DIV : AD		/ /	/ /	NEGOT DATE: / /
BRAN: PSB		/ /	/ /	PROJ DATE: / /
SECT: EET		/ /	/ /	
REVR :		/ /	/ /	
CONTR:		/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review attached data (MRID #45918801) (Staph & Salmonella) for acceptability.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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SUBMISSION BAR CODE # 5623448REVIEWER KLenny-Munk

EQPA

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 189DESCRIPTOR Revised Labeling & Efficacy Data Support

[] CHILD RESISTANT PACKAGING: [] CERTIFICATION
[] NON-RESIDENTIAL USE ONLY
[] NOT APPLICABLE

REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL

PROPOSED CLASSIFICATION: [] GENERAL [] RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

09 27 0210 01 0210 03 02~~METHOD OF SUPPORT:~~~~FORMULATORS' EXEMPTION~~

[] ~~CITE ALL~~
[] ~~SELECTIVE~~
[] ~~NOT SUBMITTED~~
[] ~~NOT APPLICABLE~~
[] ~~INCORRECT/RESUB~~

[] ~~SUBMITTED~~
[] ~~NOT SUBMITTED~~
[] ~~NOT APPLICABLE~~
[] ~~INCORRECT/RESUB~~

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY

EFFICACY

TOXICOLOGY

HED TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER

STATUS

RESPONSE CODE 13

RESPONSE DATE

JAN 29 2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 29 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Olivia Laird
CID Lines
c/o Laird's Regulatory Consultants
501 South Lincoln Avenue
Sterling, VA 20164-2024

Subject: CID 2000
EPA File Symbol 71355-E
Your Application Dated September 27th, 2002
EPA Received Date October 1st, 2002

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable for the following reasons:

The submitted efficacy data(MRID No. 457670-02) **do not support** the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least all 10 carriers tested;however, DIS/TSS-1 requires testing of 60 carriers. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least at 1×10^4 . The neutralization confirmation control showed positive growth against *Staphylococcus aureus*.

Please note: The laboratory may have incorrectly reported the number of carriers tested. The test summary results (page 7 of the MRID) indicated 60 carriers were tested for *Salmonella choleraesuis*, and test procedures (page 27 of the MRID)called for testing of 60 carriers. However, the Report Form(page 9 of the MRID) indicates that 10 carriers were tested.

The submitted efficacy data (MRID No. 457670-02) **do not support** the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Pseudomonas aeruginosa* on hard, non-porous surfaces in the persence of a 5% organic soil load(horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a dilution of 1:38 or 1:512. The product was not effective on at least 59 of 60 carriers for the product lots tested.

The submitted efficacy data(MRID No. 457670-03) **do not support** the use of product, CID 2000, as a disinfectant with bactericidal activity when tested against *Escherichia coli* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot.

Acceptable Data

The submitted efficacy data(MRID No. 457670-010)**supports** the use of the product, CID 2000, as a disinfectant with virucidal activity when tested against *Infectious Bursal Disease virus*(strain D78, ATCC VR-2041) on hard, non-porous hard surfaces in the presence of a 5% organic soil load (fetal bovine serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:384 dilution. Cytotoxicity was observed at the 10^{-1} to 10^{-2} dilutions.

The submitted efficacy data(MRID No. 457670-02) **supports** the use of the product, CID 2000, with bactericidal activity when tested against *Staphylococcus aureus* on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on least 59 of 60 carriers for each product lot tested. All three product lots were at neutralization evaluation control showed positive growth.

The submitted efficacy data(MRID No. 457670-03) **appear to support** the use of the product, CID 2000, as a disinfectant with bactericidal activity when tested against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis*, serotype enteritidis on hard, non-porous surfaces in the presence of a 5% organic soil load(horse serum) and 400 ppm hard water for a contact time of 10 minutes at 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot. The dried carrier counts were above 1×10^4 , as required. The neutralization effectiveness control showed positive growth against *Mycoplasma gallinarum*.

Labeling

The proposed label claims(as supported by MRID No. 457670-02) **are not acceptable** regarding the use of the product, CID 2000, as a disinfectant against *Samonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. Provide the Agency with a clarification by or from the laboratory as to whether 10 or 60 carriers were tested in this study. If 60 carriers were tested, then provide the Agency additional data that will demonstrate neutralization against *Salmonella choleraesuis*. If 60 carriers were not tested, then the proposed label claims regarding *Salmonella choleraesuis* and product use as a "broad spectrum disinfectant" needs to be removed from the label. Adequate and acceptable efficacy data must be generated and submitted for an efficacy determination(refer to item(b)) of DIS/TSS-1 enclosure requirements.

Until adequate and acceptable efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" at the top of page #1 is considered unacceptable. The indicated label comments are applicable for the proposed label, CID 2000, pinpunched 10-01-2002.

However, the proposed label claims are acceptable regarding the use of the product, CID 2000, as a disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes.

<u>Organisms</u>	<u>Dilution</u>	<u>MRID No.</u>
Infectious Bursal Disease virus (Strain D78, ATCC VR-20410)	1:384	MRID No. 457670-01
Listeria monocytogenes	1:512	MRID No. 457670-03
Mycoplasma gallinarum	1:512	MRID No. 457670-03
Salmonella choleraesuis	1:512	MRID No. 457670-03
Staphylococcus aureus	1:256	MRID No. 457670-02

Revise the First Aid statements as per PR Notice 2001-1.

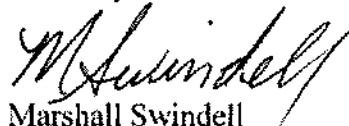
A complete copy of the science review is enclosed for your records.

The product may not be lawfully distributed in interstate commerce until it is registered.

The Agency reserves a full label review until the above discrepancy have been clarified.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :

HYDROGEN PEROXIDE

20.5%

PEROXYACETIC ACID

4.9%

Inert ingredients

68.6%

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See label and/or MSD for First Aid and Precautionary Statements

CID 2000 is effective against :

- Bacteria *Salmonella Choleraesuis* (ATCC 10708), *Staphylococcus aureus* (ATCC 6538) in a dilution of 1:256 in 400ppm AOAC synthetic hard water with 5% soil load. *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), *Salmonella Choleraesuis* serotype enteritidis (ATCC 13076) in a dilution of 1:512 in 400ppm AOAC synthetic hard water with 5% soil load
- Virus *Infectious Bursal Disease of Chickens* (ATCC D78 VR-2041), *Newcastle Disease* (*Spalax strain 539016*) in a dilution of 1:384 in 400ppm AOAC synthetic hard water with 5% soil load

EPA Reg. N° : 71355-

NET CONTENTS : 1 - 5 gallons

BATCH N° :

EPA Est. N° : 71355-BEL-001

EXPIRY DATE :

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment.

1. Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)
2. Hatchers, Setters, and chick processing facilities
3. Food processing plants (slaughterhouses)
4. Trays, racks, carts, chick boxes, cages and other hard surfaces
5. Trucks and other vehicles
6. Veterinary hospitals

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

CID LINES
THE PROFESSIONAL HYGIENE COMPANY

NV CID LINES SA - Waterpoortstraat 2
3000 IEPEL - BELGIUM / EUROPE
tel. 011 52 57 21/077
fax 011 52 57 212877
e-mail info@cidlines.be

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labelling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanised and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.

2. Hatcheries :

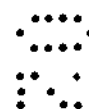
Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non porous surfaces by applying

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tel 011 32 57 217567
fax 011 32 57 217879
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the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

5. Veterinary hospitals :

For disinfection of the following hard non-porous surfaces: floors, walls, ceilings, counters, cages, feeding/drinking equipment, and handling/restraining equipment. Remove animals and feed from the premises. Clean all surfaces if visibly soiled. Saturate surfaces with the disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house livestock or employ equipment until surfaces have been absorbed or dried. Thoroughly scrub treated feeding and watering equipment with soap or detergent and rinse with potable water before reuse. Fresh disinfecting solution should be made daily or if visibly soiled.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal.

Storage: Never return CID 2000 to the original container after it has been retrieved. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, rinse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak or spill: Stop leak if this can be done without risk. Shut off ignition sources, no flames, smoking, fires or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or residue is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container: Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties of merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and Manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability or tort of otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall the manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

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e-mail: cid.lines@cidlines.be

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :

HYDROGEN PEROXIDE

26.5%

PEROXYACETIC ACID

4.9%

Inert ingredients

58.6%

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See the label for First Aid and Hazardous Statements

CID 2000 is effective against :

- Bacteria : *Salmonella Choleraesuis* (ATCC 10708), *Staphylococcus aureus* (ATCC 6538) in a dilution of 1 : 256 in 400ppm AOAC synthetic hard water with 5% soil load. *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), *Salmonella Choleraesuis* serotype enteritidis (ATCC 13076) in a dilution of 1 : 512 in 400ppm AOAC synthetic hard water with 5% soil load
- Virus : Infectious Bursal Disease of Chickens (ATCC D78 VR-2041) Newcastle Disease (Spafas strain 539016) in a dilution of 1 : 384 in 400ppm AOAC synthetic hard water with 5% soil load

EPA Reg. N° : 71355

NET CONTENTS : 1 : 5 gallon(s)

BATCH N°

EPA Est. N° : 71355 BEL-001

EXPIRY DATE

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment

- 1 Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)
- 2 Hatchers, Setters, and chick processing facilities
- 3 Food processing plants (slaughterhouses)
- 4 Trays, racks, carts, chick boxes, cages and other hard surfaces
- 5 Trucks and other vehicles
- 6 Veterinary hospitals

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

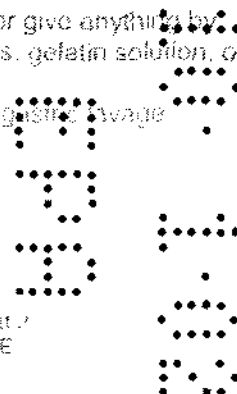
IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

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PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER, CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible; however, at temperatures exceeding 150°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labelling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanised and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- Remove all animals and food from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- Fresh disinfecting solution should be made daily.

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying

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Fax: 011 32 57 217879
e-mail: cidlines@cidlines.be

the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

5. Veterinary hospitals :

For disinfection of the following hard non-porous surfaces : floors, walls, ceilings, counters, cages, feeding/drinking equipment, and handling/restraining equipment. Remove animals and feed from the premises. Clean all surfaces if visibly soiled. Saturate surfaces with the disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house livestock or employ equipment until surfaces have been absorbed or dried. Thoroughly scrub treated feeding and watering equipment with soap or detergent and rinse with potable water before reuse. Fresh disinfecting solution should be made daily or if visibly soiled.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal.

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, close container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources : no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning, if burned, stay out of smoke.

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The manufacturer warrants (a) that this product conforms to the chemical description on the label, (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purposes. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

CID LINES®
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e-mail cidlines@cidlines.be

CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active Ingredients :

HYDROGEN PEROXIDE
PEROXYACETIC ACID

26.5%

4.9%

Inert ingredients

68.6%

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See front panel for First Aid and Precautionary Statements.

CID 2000 is effective against :

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- *Virus : Infectious Bursal Disease of Chickens (ATCC D78.VR-2041), Newcastle Disease (Spafas strain 539016)* in a dilution of 1 : 384 in 400ppm AOAC synthetic hard water with 5% soil load

EPA Reg. N° : 71355-

NET CONTENTS 1 5 gallon(s)

BATCH N°

EPA Est. N° 71355-BEL-001

EXPIRY DATE :

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. *Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)*
2. *Hatchers, Setters, and chick processing facilities*
3. *Food processing plants (slaughterhouses)*
4. *Trays, racks, carts, chick boxes, cages and other hard surfaces*
5. *Trucks and other vehicles*
6. *Veterinary hospitals*

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

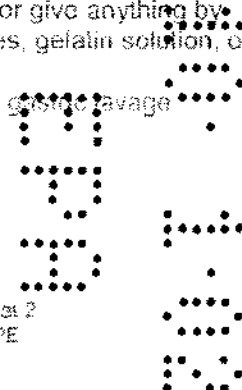
IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

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S900 IEPER - BELGIUM - EUROPE
tel 011 32 57 217677
fax 011 32 57 217678
e-mail cidlines@cidlines.be



PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible, however, at temperatures exceeding 156°F decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE :

It is a violation of federal law to use this product in a manner inconsistent with its labelling.

1. Farm equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings) :

For disinfection of hard, non-porous surfaces : stainless, galvanised and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- Disinfection of equipment. Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- Fresh disinfecting solution should be made daily.

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

3. Food processing plants (including Chicken Processing Facilities) :

Before using this product, all food products and packaging materials must be removed from the room or carefully protected. Pre-clean surfaces if visibly soiled. Disinfect hard, non-porous surfaces by applying

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the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

5. Veterinary hospitals :

For disinfection of the following hard non-porous surfaces : floors, walls, ceilings, counters, cages, feeding/drinking equipment, and handling/restraining equipment. Remove animals and feed from the premises. Clean all surfaces if visibly soiled. Saturate surfaces with the disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house livestock or employ equipment until surfaces have been absorbed or dried. Thoroughly scrub treated feeding and watering equipment with soap or detergent and rinse with potable water before reuse. Fresh disinfecting solution should be made daily or if visibly soiled.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

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CID 2000

CONCENTRATED BROAD SPECTRUM DISINFECTANT

Active ingredients :

HYDROGEN PEROXIDE
PEROXYACETIC ACID

26.5%

4.9%

Inert ingredients

68.6 %

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for First Aid and Precautionary Statements.

CID 2000 is effective against :

- Bacteria : *Salmonella Choleraesuis* (ATCC 10708), *Staphylococcus aureus* (ATCC 6538) in a dilution of 1 :256 in 400ppm AOAC synthetic hard water with 5% soil load. *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), *Salmonella Chloeraesuis serotype enteritidis* (ATCC 13076) in a dilution of 1 :512 in 400ppm AOAC synthetic hard water with 5% soil load
- Virus : *Infectious Bursal Disease of Chickens* (ATCC D78, VR-2041), *Newcastle Disease* (Spafas strain 539016) in a dilution of 1 :384 in 400ppm AOAC synthetic hard water with 5% soil load

EPA Reg. N° : 71355-

NET CONTENTS : 1 – 5 gallon(s)

BATCH N° :

EPA Est. N° : 71355-BEL-001

EXPIRY DATE :

APPLICATION :

Disinfection of non-food surfaces, farm, animal, and poultry housing facilities and equipment :

1. Farm Equipment and animal housing buildings (poultry & turkey grow-out houses, laying houses, swine production and housing, barns and large animal buildings)
2. Hatchers, Setters, and chick processing facilities
3. Food processing plants (slaughterhouses)
4. Trays, racks, carts, chick boxes, cages and other hard surfaces
5. Trucks and other vehicles
6. Veterinary hospitals.

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

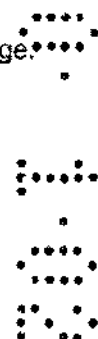
IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

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Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

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For disinfection of hard, non-porous surfaces : stainless, galvanised and painted steel, copper, aluminum, finished wood, vinyl, plastics, glazed tiles, brick walls, sandwich panels and feeding/drinking equipment :

- A. Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks, and other feeding and watering appliances.
- B. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with disinfecting solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes.
- C. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried.
- D. Thoroughly scrub treated feed racks, troughs, and other feeding and water appliances with soap or detergent and rinse with potable water before reuse.
- E. Disinfection of equipment : Immerse all halters, ropes, and other types of restraining equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure in the disinfecting solution for 10 minutes. Allow to air dry.
- F. Fresh disinfecting solution should be made daily.

2. Hatcheries :

Hatcheries : Remove all animals from the area. Thoroughly clean all surfaces (hatchers, setters, trays, racks, carts, sexing tables, chick boxes, cages) with soap or detergent, then rinse with water. Saturate all surfaces with disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house animals or employ equipment until surfaces have been absorbed or dried. Fresh disinfecting solution should be made daily or if visibly soiled.

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the disinfecting solution with spray, mop, or sponge. All surfaces must remain thoroughly wet for 10 minutes. Allow to air dry. A potable water rinse is required for all surfaces that come into contact with food.

4. Trucks and other vehicles :

Clean all vehicles including mats, crates, cabs, and wheels with high pressure water. Use the disinfecting solution to treat all vehicles. Leave all treated surfaces exposed to disinfectant solution wet for 10 minutes. Allow to air dry.

5. Veterinary hospitals :

For disinfection of the following hard non-porous surfaces : floors, walls, ceilings, counters, cages, feeding/drinking equipment, and handling/restraining equipment. Remove animals and feed from the premises. Clean all surfaces if visibly soiled. Saturate surfaces with the disinfecting solution by using a spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Do not house livestock or employ equipment until surfaces have been absorbed or dried. Thoroughly scrub treated feeding and watering equipment with soap or detergent and rinse with potable water before reuse. Fresh disinfecting solution should be made daily or if visibly soiled.

STORAGE AND DISPOSAL :

Do not contaminate water, food, or feed by storage and disposal

Storage : Never return CID 2000 to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute CID 2000 with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. Do not store on wooden pallets.

Procedures for leak of spill : Stop leak if this can be done without risk. Shut off ignition sources ; no flames, smoking, flares or spark-producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discharged, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

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Note : This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is a reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions. Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries, resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 22, 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

Subject: Secondary Review of Contractor's (DynCorp Systems & Solutions LLC)
Efficacy Review of CID 2000,
EPA Reg. No. 71355-E,
Case No. 069188
DP Barcode: D286206

From: Bruce H. Mann *Bruce H. Mann*
Efficacy Evaluation Team
Product Science Branch (7510C)

To: Marshall Swindell, PM 33/Karen Leavy-Munk
Regulatory Management Team II
Antimicrobials Division (7510C)

Thru: Emily Mitchell, M.S., Team Leader *Emily Mitchell 1/25/03*
Efficacy Evaluation
Antimicrobials Division (7510C)

Applicant: NV CID LINES® SA
8900 Ieper, Belgium

Formulation Label:

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Hydrogen peroxide	26.50
Peroxyacetic acid	4.90
<u>Inert Ingredient(s)</u>	68.60
Total	100.00

I BACKGROUND

The product, CID 2000 (EPA Reg. No. 71355-E), is a new product. The applicant requested to register the product as a broad spectrum disinfectant and virucide for use on hard, non-porous, non-food contact surfaces on farms and in veterinary hospitals and food processing plants. The label claims that the product is effective in the presence of a 5% organic soil load. Studies were conducted at Southern Microbiology Associates, LLC located at 4204 Edmonton Drive in Bessemer, Alabama 35022; and Hill Top Research, Inc. located on Main and Mill Streets in Miami, Ohio 45147.

This data package contained EPA Form 8570-4 (Confidential Statement of Formula), three studies (MRID Nos. 457670-01 through 457670-03), Statements of No Data Confidentiality Claims for all three studies, and the proposed label.

Note: Correspondence from the applicant states that CID 2000 (primary name) and Kickstart (additional name) are "identical products towards chemical composition."

Note: The data package included a label for the acid-based sanitizer, CID 2000 (dated-stamped September 12, 2000 by EPA), and a label for the disinfectant, CID 2000 (date-stamped October 1, 2002 by EPA). The formulations for the two products are slightly different. The label for the acid-based sanitizer, CID 2000, appears to be irrelevant to the data package and may be a previous draft of the product label.

Note: EPA Form 8570-4 (Confidential Statement of Formula) contains Confidential Business Information. Data or information claimed by the applicant to be FIFRA confidential has not been included in this report.

II USE DIRECTIONS

The product is designed to be used for disinfecting hard, non-porous surfaces such as buildings, floors, walls, ceilings, counters, animal pens/cages, vehicle items (e.g., mats, crates, cabs, wheels); feeding/drinking equipment, and handling/restraining equipment. Directions on the proposed label provided the following information regarding preparation and use of the product as a disinfectant: Prepare use solution by mixing an appropriate amount of the product with water (1:256 to treat against *Salmonella choleraesuis*, *Staphylococcus aureus*; 1:512 to treat against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis* serotype *enteritidis*; and 1:384 to treat against Infectious Bursal Disease virus and Newcastle Disease virus). Remove all animals and feed from the area. Remove all litter and manure from floors, walls, and surfaces. Empty all feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with use solution by using spray, mop, or sponge. Surfaces must remain wet for 10 minutes. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed or dried. Before reuse, thoroughly scrub treated feeding and watering appliances with soap or detergent and rinse with potable water. Disinfect equipment by immersing equipment in use solution for 10 minutes. Allow to air dry. Fresh disinfecting solution should be made daily.

III AGENCY STANDARDS FOR PROPOSED CLAIMS

Virucides

The effectiveness of virucides against specific viruses must be supported by efficacy data that simulates, to the extent possible in the laboratory, the conditions under which the product is intended to be used. Carrier methods that are modifications of either the AOAC Use-Dilution Method (for liquid disinfectants) or the AOAC Germicidal Spray Products Test (for spray disinfectants) must be used in developing data for virucides intended for use upon dry inanimate, environmental surfaces (e.g., floors, tables, cleaned dried medical instruments). To simulate in-use conditions, the specific virus to be treated must be inoculated onto hard surfaces, allowed to dry, and then treated with the product according to the directions for use on the product label. One surface for each of two different batches of disinfectant must be tested against a recoverable virus titer of at least 10^4 from the test surface for a specified exposure period at room temperature. Then, the virus must be assayed by an appropriate virological technique, using a minimum of four determinations per each dilution assayed. Separate studies are required for each virus. The calculated viral titers must be reported with the test results. For the data to be considered acceptable, results must demonstrate complete inactivation of the virus at all dilutions. When cytotoxicity is evident, at least a 3-log reduction in titer must be demonstrated beyond the cytotoxic level. These Agency standards are presented in DIS/TSS-7.

Disinfectants for Use on Hard Surfaces (Against a Broad Spectrum of Microorganisms)

The effectiveness of disinfectants for use on hard surfaces must be substantiated by data derived using the AOAC Use-Dilution Method (for water soluble powders and liquid products) or the AOAC Germicidal Spray Products Test (for spray products). Sixty carriers must be tested with each of 3 product samples, representing 3 different batches, one of which is at least 60 days old, against *Salmonella choleraesuis* (ATCC 10708) and *Staphylococcus aureus* (ATCC 6538). To support products labeled as "general disinfectants," killing on 59 out of 60 carriers is required to provide effectiveness at the 95% confidence level. The above Agency standards are presented in DIS/TSS-1.

Effectiveness of disinfectants against specific microorganisms other than those named in the AOAC Use-Dilution Method, AOAC Germicidal Spray Products Test, AOAC Fungicidal Test, and AOAC Tuberculocidal Activity Method, but not including viruses, must be determined by either the AOAC Use-Dilution Method or the AOAC Germicidal Spray Products Test. Ten carriers must be tested against each specific microorganism with each of 2 product samples, representing 2 different batches. To support products labeled as "disinfectants" for specific microorganisms (other than those microorganisms named in the above test methods), killing of the specific microorganism on all carriers is required. In addition, plate count data must be submitted for each microorganism to demonstrate that a concentration of at least 10^4 microorganisms survived the carrier-drying step. These Agency standards are also presented in DIS/TSS-1.

Supplemental Claims

An antimicrobial agent identified as a "one-step" cleaner-disinfectant, cleaner-sanitizer, or one intended to be effective in the presence of organic soil must be tested for efficacy with an appropriate organic soil load, such as 5 percent serum. These Agency standards are presented in DIS/TSS-2. The hard water tolerance level may differ with the level of antimicrobial activity (e.g., sanitizer vs. disinfectant) claimed. To establish disinfectant efficacy in hard water, all microorganisms (i.e., bacteria, fungi, viruses) claimed to be controlled must be tested by the appropriate Recommended Method at the same hard water tolerance level. These Agency standards are presented in DIS/TSS-2.

IV COMMENTS ON THE SUBMITTED EFFICACY STUDIES

1. MRID 457670-01 "Virucidal Evaluation of Kick-Start for Use on Inanimate Environmental Surfaces: Test for Efficacy Against Infectious Bursal Disease Virus," by Hazel R. Bowdon. Study conducted at Southern Microbiology Associates, LLC. Study completion date – May 23, 2002.

This study was conducted against Infectious Bursal Disease virus (Strain D78, ATCC VR-2041), using chick embryo fibroblasts as the host system (source of host not indicated). Two lots (Lot Nos. 104760 and 200260) of the product, Kickstart, were tested according to the EPA Pesticide Assessment Guidelines, 1982. A use solution was prepared by diluting 1 mL of the product in 38.3 mL of 402.5 ppm hard water (a 1:384 dilution). The stock virus titer contained a 5% organic soil load (fetal bovine serum). Films of virus were prepared by spreading 0.2 mL of virus inoculum uniformly over approximately 23 to 28 cm² on the bottoms of sterile glass Petri dishes. The virus films were air-dried at 20-25°C for 20-45 minutes. For each lot of product, virus films were exposed to 2.0 mL of the use solution at 23°C. The exposure was terminated after 9.5 minutes by passage through Sephadex gel columns. This procedure lasted approximately 30 seconds, which increased the exposure to 10 minutes. The Sephadex filtered solutions were diluted serially in 1-log dilutions. Each serial dilution was added in a 0.2 mL quantity to each of 4 wells of chick embryo fibroblasts. Controls included cytotoxicity and neutralization. Viral and cytotoxicity titers were calculated by the Reed and Muench method (1938).

2. MRID 457670-02 "AOAC Use-Dilution Method" for Kickstart, by Kathleen A. Baxter. Study conducted at Hill Top Research, Inc. Study completion date – November 20, 2001

This study was conducted against *Staphylococcus aureus* (ATCC 6538), *Salmonella choleraesuis* (ATCC 10708), and *Pseudomonas aeruginosa* (ATCC 15442). Three lots (Lot Nos. 101760, 102360, and 102960) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. The product was tested in the presence of a 5% organic soil load (horse serum). All product lots were at least 60 days old at the time of testing with one exception; it is unconfirmed whether at least one of the product lots tested against *Pseudomonas aeruginosa* (at a 1:512 dilution) was at least 60 days old at the time of testing. A 1:256 dilution of the product (using 400±10 ppm AOAC synthetic hard water (titrated value not indicated)) was tested against *Staphylococcus aureus* and *Salmonella choleraesuis*. A 1:384 and 1:512 dilution of the product (using 400±10 ppm AOAC synthetic hard water (titrated value not indicated)) was tested

against *Pseudomonas aeruginosa*. Polished stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a 48-54 hour old suspension of the test organism. The carriers then were dried for 40 minutes at $37\pm1^{\circ}\text{C}$. The carriers were exposed to 10 mL of the use solution for 10 minutes at $20\pm1^{\circ}\text{C}$. After exposure, the carriers were transferred into tubes containing 10 mL of Lethen Broth. After 30 minutes, the carriers were subcultured again into tubes containing Lethen Broth. All tubes were incubated at $37\pm1^{\circ}\text{C}$ for 48 ± 2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included phenol resistance, neutralization evaluation, cytotoxicity, and dried carrier counts.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

3. MRID 457670-03 "AOAC Use-Dilution Method" for Kickstart, by Kathleen A. Baxter. Study conducted at Hill Top Research, Incorporated. Study completion date – February 1, 2002.

This study was conducted against *Escherichia coli* (ATCC 11229), *Listeria monocytogenes* (ATCC 15313), *Mycoplasma gallinarum* (ATCC 19708), and *Salmonella choleraesuis*, serotype *enteritidis* (ATCC 13076). Two lots (Lot Nos. 101760 and 102360) of the product, Kickstart, were tested using the AOAC Use-Dilution Method, as described in the AOAC Official Methods of Analysis, 15th Edition, 1990. The product was tested at a 1:512 dilution in 400 ± 10 ppm AOAC synthetic hard water (titrated value not indicated) in the presence of a 5% organic soil load (horse serum). Ten polished stainless steel cylinder carriers were immersed for 15 minutes in 10 mL of a suspension of the test organism. The carriers then were dried for 40 minutes at $37\pm1^{\circ}\text{C}$. The carriers were exposed to 10 mL of the use solution for 10 minutes at $20\pm1^{\circ}\text{C}$. After exposure, the carriers were transferred into tubes containing 10 mL of Lethen Broth (for *Escherichia coli* and *Salmonella choleraesuis*, serotype *enteritidis*), Brain Heart Infusion Broth (for *Listeria monocytogenes*), or Mycoplasma Medium (for *Mycoplasma gallinarum*). After 30 minutes, the carriers were subcultured again into tubes containing neutralizing medium. All tubes were incubated at $37\pm1^{\circ}\text{C}$ for 48 ± 2 hours except tubes containing *Mycoplasma gallinarum* which were incubated at $37\pm1^{\circ}\text{C}$ with 5% CO_2 for 48 ± 2 hours. Following incubation, the tubes were observed for growth or no growth. Controls included phenol resistance, neutralization evaluation, cytotoxicity, and dried carrier counts.

Note: Protocol deviations/amendments reported in the study were reviewed and found to be acceptable.

V RESULTS

MRID	Organism	Results			Dried Virus Control (TCID ₅₀ /0.2 mL)
			Lot No. 104760	Lot No. 200260	
457670-01	Infectious Bursal Disease virus (Strain D78, VR-2041)	10 ⁻¹ and 10 ⁻² dilution	Cytotoxicity present	Cytotoxicity present	5.5
		10 ⁻³ to 10 ⁻⁶ dilution	Complete inactivation	Complete inactivation	
		TCID ₅₀ /0.2 mL	≤2.5	≤2.5	
		Log reduction	≥3.0	≥3.0	

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested			Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	Lot No. 102960	
457670-02	<i>Staphylococcus aureus</i>	1° - 1/60 2° - 0/60	1° - 0/60 2° - 0/60	1° - 0/60 2° - 0/60	7.4×10^6
457670-02	<i>Pseudomonas aeruginosa</i> 1:512 in 400 ppm	1° - 2/60 2° - 3/60	1° - 1/60 2° - 3/60	1° - 2/60 2° - 2/60	5.2×10^6
	1:384 in 405 ppm	1° - 1/60 2° - 2/60	1° - 1/60 2° - 1/60	1° - 0/60 2° - 3/60	8.2×10^6
457670-02	<i>Salmonella choleraesuis</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.3×10^6

MRID Number	Organism	No. Exhibiting Growth/Total No. Tested		Dried Carrier Count (CFU/carrier)
		Lot No. 101760	Lot No. 102360	
457670-03	<i>Escherichia coli</i>	1° - 10/10 2° - 10/10	1° - 10/10 2° - 10/10	2.2×10^7
	<i>Listeria monocytogenes</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.6×10^6
	<i>Mycoplasma gallinarum</i>	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	6.8×10^5
	<i>Salmonella choleraesuis</i> , serotype enteritidis	1° - 0/10 2° - 0/10	1° - 0/10 2° - 0/10	1.5×10^6

VI CONCLUSIONS

1. The submitted efficacy data (MRID No. 457670-01) support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with virucidal activity when tested against Infectious Bursal Disease virus (Strain D78, ATCC VR-2041) on hard, non-porous surfaces in the presence of a 5% organic soil load (fetal bovine serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:384 dilution. Cytotoxicity was observed at the 10^{-1} to 10^{-2} dilutions. Complete inactivation (no growth) was observed in the 10^{-3} to 10^{-6} dilutions. A 3-log reduction in titer was demonstrated beyond the cytotoxic level. The recoverable virus titer was at least 10^4 .

2. The submitted efficacy data (MRID No. 457670-02) support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Staphylococcus aureus* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least 59 of 60 carriers for each product lot tested. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 . The neutralization evaluation control showed positive growth.

3. The submitted efficacy data (MRID No. 457670-02) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a 1:256 dilution. The product was effective on at least all 10 carriers tested; however, DIS/TSS-1 requires testing of 60 carriers. All three product lots were at least 60 days old at the time of testing. The dried carrier counts were at least 1×10^4 . The neutralization confirmation control showed positive growth against *Staphylococcus aureus*.

Note: The laboratory may have incorrectly reported the number of carriers tested. The test summary results [page 7 of the MRID] indicated 60 carriers were tested for *Salmonella choleraesuis*, and test procedures [page 27 of the MRID] called for testing of 60 carriers. However, the Report Form [page 9 of the MRID] indicates that 10 carriers were tested.

4. The submitted efficacy data (MRID No. 457670-02) do not support the use of the product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Pseudomonas aeruginosa* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water surfaces for a contact time of 10 minutes at a dilution of 1:384 or 1:512. The product was not effective on at least 59 of 60 carriers for the product lots tested.

5. The submitted efficacy data (MRID No. 457670-03) appear to support the use of the product, CID 2000 (primary name) or Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Listeria monocytogenes*, *Mycoplasma gallinarum*, and *Salmonella choleraesuis*, serotype *enteritidis* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:512 dilution. The product was effective on 10 of 10 carriers for each product lot tested. The dried carrier counts were above 1×10^4 , as required. The neutralization effectiveness control showed positive growth against *Mycoplasma gallinarum*.

6. The submitted efficacy data (MRID No. 457670-03) do not support the use of product, CID 2000 (primary name) and Kickstart (additional name), as a disinfectant with bactericidal activity when tested against *Escherichia coli* on hard, non-porous surfaces in the presence of a 5% organic soil load (horse serum) and 400 ppm hard water for a contact time of 10 minutes at a 1:512 dilution. The product was not effective on 10 of 10 carriers for each product lot.

VII RECOMMENDATIONS

1. The proposed label claims are acceptable regarding the use of the product, CID 2002 (primary name) and Kickstart (additional name), as a disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes:

<u>Organisms</u>	<u>Dilution</u>	<u>MRID No.</u>
Infectious Bursal Disease virus (Strain D78, ATCC VR-2041)	1:384	MRID No. 457670-01
<i>Listeria monocytogenes</i>	1:512	MRID No. 457670-03
<i>Mycoplasma gallinarum</i>	1:512	MRID No. 457670-03
<i>Salmonella choleraesuis</i> , serotype <i>enteritidis</i>	1:512	MRID No. 457670-03
<i>Staphylococcus aureus</i>	1:256	MRID No. 457670-02

2. The proposed label claims (as supported by MRID No. 457670-02) are not acceptable regarding the use of the product, CID 2002 (primary name) and Kickstart (additional name), as a disinfectant against *Salmonella choleraesuis* on hard, non-porous surfaces in the presence of a 5% organic soil load and 400 ppm hard water for a contact time of 10 minutes at a 1:256 dilution. The applicant needs to provide the Agency with a clarification by or from the laboratory as to whether 10 or 60 carriers were tested in this study. If 60 carriers were tested, then, the applicant needs to provide the Agency additional data that will demonstrate neutralization against *Salmonella choleraesuis*. If 60 carriers were not tested, then proposed label claims regarding *Salmonella choleraesuis* and product use as a broad-spectrum disinfectant need to be removed from the label. Adequate and acceptable efficacy must be generated and submitted for an efficacy determination (refer to item (b) of DIS/TSS-1 enclosure for efficacy requirements).

Until adequate efficacy data are submitted for a determination against *Salmonella choleraesuis*, the use of the phrase "broad spectrum disinfectant" at the top of page #1 is considered unacceptable. The indicated label comments are applicable for the proposed label "CID 2000" pinpunched 10-01-2002.

3. Efficacy data submitted for the following microorganisms do not support effectiveness of the product at a 10 minute contact time in the presence of a 5% organic soil load. Eventhough, the proposed label does not include label claims for these microorganisms, a listing of the proposed test microorganisms is considered unacceptable. Until adequate efficacy data are submitted in support of effectiveness against *Pseudomonas aeruginosa*, the proposed label claim for veterinary hospitals is considered unacceptable. The comment is applicable for page #3 on the proposed label "CID 2000" pinpunched 10-01-2002.

- *Pseudomonas aeruginosa*, as supported by MRID No. 457670-02
- *Escherichia coli*, as supported by MRID No. 457670-03

4. The proposed label includes claims of product efficacy against Newcastle Disease virus at a 1:384 dilution. The submitted data package provided to the Agency do not include any efficacy studies in support of this proposed label claim. Therefore, the proposed label claim against the

microorganism, New Castle Disease virus, is unacceptable and must be removed from the product proposed label "CID 2000", pinpunched 10-01-2002.

5. Until the applicant submit adequate and acceptable efficacy data in support of a usage for veterinary hospitals and a use as a broad spectrum disinfectant, the product proposed label "CID 2002" is considered unacceptable.

E 128

TASK ASSIGNMENT FORM(TAF)
Antimicrobial Division/OPP--Effective June 5, 1998

PO: Zenobia Jones

A -- Completed by Reviewer/Team Leader (check(✓) or complete appropriate boxes)					
RASSB _____	PSB <u>X</u>	Product Toxicology	Human Toxicology_	Product Chemistry	Efficacy <u>X</u>
Chemical: Hydrogen peroxide				DP Barcode: D286206	
Type: Registration _ RED _ Prod. Reregistration_ FQPA <u>X</u> Special Project _ Lit. Search_ Other _____					
Due Date: 12/16/02		AD Contact: Emily Mitchell		Team Leader: Emily Mitchell	
Completed by Reviewer/Team Leader					C - Completed By Contractor
Study/Action	MRID	GDLN #	Gov't Est Hrs	Tech Hrs. Spent	
Virucidal Evaluation of Kick-Start for Use on Inanimate Environmental Surfaces: Test for Efficacy Against Infectious Bursal Disease Virus	457670-01	91-2	5		
AOAC Use-Dilution Method	457670-02	91-2	5		
AOAC Use-Dilution Method	457670-03	91-2	5		
Review Instructions/Comments					See attached page_

D -- Completed by WAM/PO				
Action No: E128	Date Sent:	WAM/PO:	Branch Chief (For Special Projects):	
E -- Completed by Contractor				
Date Delivered:	Delivery :	Fed Ex_	Courier_	Electronic_ Other_
Principal Reviewers:				
Issues/Comments for Secondary Reviewer Attention:				
				See attached page_
F -- Completed by Secondary Reviewer(Antimicrobial Division)				
Minor Changes/Resolution with Contractor ____		Major Changes/Resolution with Contractor ____		
Secondary Review Hours ____		Accepted ____	Unacceptable ____	
Reviewer Comments Recommendations:				
				See attached page_

DP BARCODE: D286206

CASE: 069188
SUBMISSION: S623448

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/28/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
COMPANY: 071355 CID LINES N.V.
PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
RECEIVED DATE: 10/01/02 DUE OUT DATE: 01/29/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 286206 EXPEDITE: N DATE SENT: 10/16/02 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
P TYPE: 001

	CSF: Y		LABEL: Y	
ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 01/19/03	
DIV : AD	10/24/02	/ /	NEGOT DATE: 12/29/02	
BRAN: PSB	10/24/02	/ /	PROJ DATE: 12/15/02	
SECT: IO	10/24/02	/ /		
REVR : VMIDDLET	/ /	/ /		
CONTR: DYNCORP	10/28/02	/ /		

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Efficacy Data to support labeling
claims(457670-01; -02 and -03).

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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TASK ASSIGNMENT FORM(TAF)
Antimicrobial Division/OPP--Effective June 5, 1998

PO: Zenobia Jones

A -- Completed by Reviewer/Team Leader (check(✓) or complete appropriate boxes)					
RASSB _____	PSB <u> X </u>	Product Toxicology	Human Toxicology_	Product Chemistry	Efficacy <u> X </u>
Chemical: Hydrogen peroxide				DP Barcode: D286206	
Type: Registration_ RED_ Prod. Reregistration_ PQPA <u> X </u> Special Project_ Lit. Search_ Other _____					
Due Date: 12/16/02		AD Contact: Emily Mitchell		Team Leader: Emily Mitchell	
<input checked="" type="radio"/> Completed by Reviewer/Team Leader					<input type="radio"/> C - Completed By Contractor
Study/Action	MRID	GDLN #	Gov't Est Hrs	Tech Hrs. Spent	
Virucidal Evaluation of Kick-Start for Use on Inanimate Environmental Surfaces: Test for Efficacy Against Infectious Bursal Disease Virus	457670-01	91-2	5		
AOAC Use-Dilution Method	457670-02	91-2	5		
AOAC Use-Dilution Method	457670-03	91-2	5		
Review Instructions/Comments					
See attached page_					

D -- Completed by WAM/PO

Action No: E128

Date Sent:

WAM/PO:

Branch Chief (For Special Projects):

E -- Completed by Contractor

Date Delivered:

Delivery :

Fed Ex_

Courier_

Electronic_

Other_

Principal Reviewers:

Issues/Comments for Secondary Reviewer Attention:

See attached page__

F -- Completed by Secondary Reviewer(Antimicrobial Division)

Minor Changes/Resolution with Contractor ____

Major Changes/Resolution with Contractor ____

Secondary Review Hours ____

Accepted ____

Unacceptable ____

Reviewer Comments Recommendations:

See attached page__

DP BARCODE: D286206

CASE: 069188
SUBMISSION: S623448

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/28/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
COMPANY: 071355 CID LINES N.V.
PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
RECEIVED DATE: 10/01/02 DUE OUT DATE: 01/29/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 286206 EXPEDITE: N DATE SENT: 10/16/02 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
P TYPE: 001

	CSF: Y		LABEL: Y	
ASSIGNED TO	DATE	IN	DATE	OUT
DIV : AD	10/24/02		/	/
BRAN: PSB	10/24/02		/	/
SECT: IO	10/24/02		/	/
REVR : VMIDDLET	/	/	/	/
CONTR: DYNCORP	10/28/02		/	/

ADMIN DUE DATE: 01/19/03
NEGOT DATE: 12/29/02
PROJ DATE: 12/15/02

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Efficacy Data to support labeling
claims(457670-01; -02 and -03).

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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DP BARCODE: D286206

CASE: 069188
SUBMISSION: S623448DATA PACKAGE RECORD
BEAN SHEETDATE: 10/16/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000

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DP BARCODE: 286206 EXPEDITE: N DATE SENT: 10/16/02 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
DP TYPE: 001

	CSF: Y		LABEL: Y	
ASSIGNED TO	DATE	IN	DATE	OUT
DIV : AD	/	/	/	/
BRAN: PSB	/	/	/	/
SECT: EET	/	/	/	/
REVR :	/	/	/	/
CONTR:	/	/	/	/

ADMIN DUE DATE:	01/19/03
NEGOT DATE:	/ /
PROJ DATE:	/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Efficacy Data to support labeling
claims(457670-01; -02 and -03).

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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DP BARCODE: D286206

FQPA

CASE: 069188
SUBMISSION: S623448

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/16/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
COMPANY: 071355 CID LINES N.V.
PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
RECEIVED DATE: 10/01/02 DUE OUT DATE: 01/29/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 286206 EXPEDITE: N DATE SENT: 10/16/02 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
DP TYPE: 001

CSF: Y LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 01/19/03
DIV : AD	10/24/02	/ /	NEGOT DATE: 12/29/02
BRAN: PSB	10/24/02	/ /	PROJ DATE: 12/15/02
SECT: EET	10/24/02	/ /	
REVR :	/ /	/ /	
CONTR: <i>AmCup</i>	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Efficacy Data to support labeling
claims(457670-01; -02 and -03).

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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Laird's Regulatory Consultants, Inc

Over 28 years Experience and Expertise in The Regulation of Pesticide Products

September 27, 2002

457670-00

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: CID 2000
EPA FILE SYMBOL 71355-E
Submission of additional data to support registration

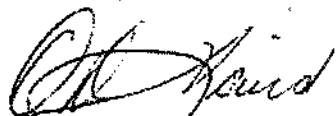
Dear Mr. Swindell:

Attached hereto please find five (5) copies of the revised labeling containing our proposed uses along with the letter of authorization from our supplier to address your chemistry data concerns. Also included with this package are the supportive efficacy data which will address efficacy concerns for the product referenced. Additional data are still underway and will be submitted after upon completion.

Please note, the efficacy data was conducted on what is potentially one of our additional brand names for this product. Rest assured that the formula is the same. Letter from the registrant is attached to the study as well to address any concerns you or the reviewers may have concerning the name on the study.

Thank you for your help in this matter. Should you have any questions or concerns please don't hesitate to let me know.

Sincerely,



Olivia D. Laird
President/Agent

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER & SPONSOR

SUBMITTER

LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVENUE
STERLING, VIRGINIA 20164-2024

SPONSOR

NV CID LINES S.A.
WATERPOORTSTRAAT 2
8900 IEPER, BELGIUM

2. REGULATORY ACTION TO BE TAKEN

Submission of Additional Efficacy Data

EPA FILE SYMBOL/REG. NO.: 71355-E

PRODUCT NAME: CID 2000(primary name)/Kickstart(additional name)

TRANSMITTAL DATE

September 27, 2002

3. LIST OF SUMMITTED STUDIES

Volume 1: Administrative Materials

45767001 Volume 2: Efficacy-against infectious bursal disease virus

45767002 Volume 3: Efficacy-AOAC Use Dilution, study #01-109138-11

45767003 Volume 4: Efficacy-AOAC Use Dilution, Study #01-109139-11

COMPANY OFFICIAL: for VINCENT CATRY

COMPANY CONTACT: OLIVIA D. LAIRD

Phone: (703) 471-6590

FAX: (703) 471-6269

W. D. Laird
Olivia D. Laird
Vol. 2

To the attention of Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division (7505C)

Ieper, sept 24, 2002,

Dear Mr. Swindell,

We would like to confirm that CID 2000 and KICKSTART are identical products towards chemical composition. CID 2000 is currently pending for registration under file number 71355-E.

All efficacy reports however (by Hilltop Research and SMA) are made under the name of KICKSTART.

In a second stage we will differentiate the two products, as they will be assigned different applications.

Yours sincerely,

Vincent Catry
CID LINES Regulatory Affairs,



CID LINES

NV/SA
Waterpoortstraat 2
8900 IEPER - Belgium
Tel +32(0)57 21 78 77 - Fax +32(0)57 21 78 79
E-mail: info@cidlines.be

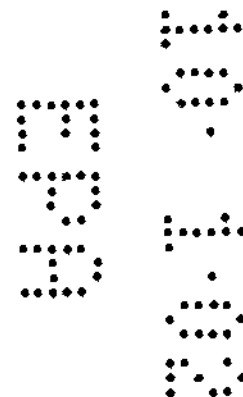


TABLE OF CONTENTS

1. Transmittal Document
2. Transmittal Letter
3. Letter of reference from Degussa on chemistry
4. Five copies of the revised label

9525

degussa.

Vincent Catry
Cld Linez NV
Waterpoortstraat 2
B-8900 Ieper
Belgium

Degussa Corporation
379 Interpace Parkway
P.O. Box 677
Parsippany, NJ 07054-0677

Direct: (973) 541-8053
Fax: (973) 541-8040

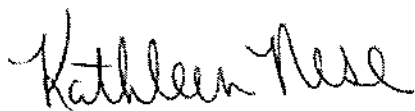
Kathleen.Nese@degussa.com
www.degussa.com

Dear Mr. Catry,

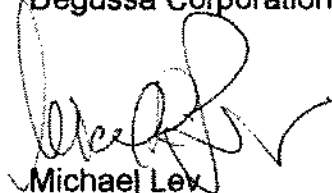
Degussa Corporation has received your request to be allowed to cite Product Chemistry data used by Degussa in the FIFRA registration of Peraclean 5. The number assigned to the report in which this data is contained is MRID 44506501. Degussa Corporation does not seek any compensation for your use of this data.

I recommend that you include a copy of this letter with your product registration documentation and associate this document with your data matrix, EPA Form 8570-35.

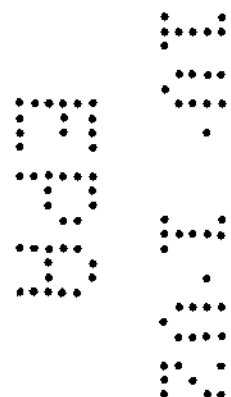
Best regards,



Kathleen Nese
Manager of Product Safety
Degussa Corporation – Product Regulatory Services



Michael Lev
Product Manager
Degussa Corporation – Bleaching and Water Chemicals



Administrative

Materials

[Handwritten signature]

DP BARCODE: D286206

FQPA

CASE: 069188
SUBMISSION: S623448

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/16/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 189 RESB FQPA-OC-ME TOO
CHEMICALS: 000595 Hydrogen peroxide 20.0000%

ID#: 071355-E CID 2000
COMPANY: 071355 CID LINES N.V.
PRODUCT MANAGER: 33 MARSHALL SWINDELL 703-308-6341 ROOM: CS1 6B
PM TEAM REVIEWER: KAREN LEAVY-MUNK 703-308-6237 ROOM: CS1 6W9
RECEIVED DATE: 10/01/02 DUE OUT DATE: 01/29/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 286206 EXPEDITE: N DATE SENT: 10/16/02 DATE RET.: / /
CHEMICAL: 000595 Hydrogen peroxide
DP TYPE: 001

	CSF: Y		LABEL: Y	
ASSIGNED TO		DATE IN	DATE OUT	ADMIN DUE DATE: 01/19/03
DIV : AD		/ /	/ /	NEGOT DATE: / /
BRAN: PSB		/ /	/ /	PROJ DATE: / /
SECT: EET		/ /	/ /	
REVR :		/ /	/ /	
CONTR:		/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Efficacy Data to support labeling
claims(457670-01; -02 and -03).

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

CID LINES
C/O OLIVIA D. LAIRD
501 SOUTH LINCOLN AVENUE
STERLING, VA 20164

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 10/01/02. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Laird's Regulatory Consultants, Inc

Over 28 years Experience and Expertise in The Regulation of Pesticide Products

September 27, 2002

457670-00

Mr. Marshall Swindell, PM 33
Environmental Protection Agency
Regulatory Management
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Subject: CID 2000
EPA FILE SYMBOL 71355-E
Submission of additional data to support registration

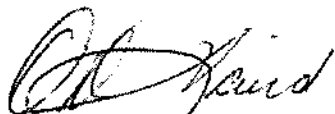
Dear Mr. Swindell:

Attached hereto please find five (5) copies of the revised labeling containing our proposed uses along with the letter of authorization from our supplier to address your chemistry data concerns. Also included with this package are the supportive efficacy data which will address efficacy concerns for the product referenced. Additional data are still underway and will be submitted after upon completion.

Please note, the efficacy data was conducted on what is potentially one of our additional brand names for this product. Rest assured that the formula is the same. Letter from the registrant is attached to the study as well to address any concerns you or the reviewers may have concerning the name on the study.

Thank you for your help in this matter. Should you have any questions or concerns please don't hesitate to let me know.

Sincerely,



Olivia D. Laird
President/Agent

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER & SPONSOR

SUBMITTER

LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVENUE
STERLING, VIRGINIA 20164-2024

SPONSOR

NV CID LINES S.A.
WATERPOORTSTRAAT 2
8900 IEPER, BELGIUM

2. REGULATORY ACTION TO BE TAKEN

Submission of Additional Efficacy Data

EPA FILE SYMBOL/REG. NO.: 71355-E

PRODUCT NAME: CID 2000(primary name)/Kickstart(additional name)

TRANSMITTAL DATE

September 27, 2002

3. LIST OF SUMITTED STUDIES

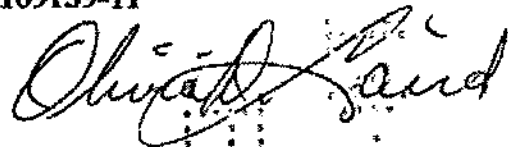
Volume 1: Administrative Materials

45767001 Volume 2: Efficacy-against infectious bursal disease virus

45767002 Volume 3: Efficacy-AOAC Use Dilution, study #01-109138-11

45767003 Volume 4: Efficacy-AOAC Use Dilution, Study #01-109139-11

COMPANY OFFICIAL: for VINCENT CATRY



COMPANY CONTACT: OLIVIA D. LAIRD

Phone: (703) 471-6590

FAX: (703) 471-6269

vol. 2

This an ACCEPTED submission

53

This is a PARTIALLY ACCEPTED/COMPLETELY REJECTED submission

FQPA

SUBMISSION BAR CODE 5603766REVIEWER Kerry-MunkCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 189DESCRIPTOR Revised Label

[] CHILD RESISTANT PACKAGING: [] CERTIFICATION
 [] NON-RESIDENTIAL USE ONLY
 [] NOT APPLICABLE

REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL

PROPOSED CLASSIFICATION: [] GENERAL [] RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

09 18 01

09 20 01

09 24 01

METHOD OF SUPPORT

FORMULATORS EXEMPTION

[] CITE-ALL
 [] SELECTIVE
 [] NOT SUBMITTED
 [] NOT APPLICABLE
 [] INCORRECT/RESUB

[] SUBMITTED
 [] NOT SUBMITTED
 [] NOT APPLICABLE
 [] INCORRECT/RESUB

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY

EFFICACY

TOXICOLOGY

HED TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER

STATUS

DEC 06 2001

196



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 06 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Olivia Laird,
Agent for NV CID Lines SA
Waterpoorstraat 2
B 8900 Ieper-Belgium

Subject: CID 2000
EPA File Symbol Number 71355-E
Your Submission Dated September 18th, 2001
EPA Received Date September 20th, 2001

Dear Ms. Laird:

The following application(s) submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable for the following reasons:

- Resubmit five (5) copies of corrected, revised product labeling
- FDA clearance letter was not submitted in support of the "Hatching Egg Sanitization" claim
- Efficacy data was not submitted in support of non-food contact surface sanitization claim
- A Data Matrix form was not submitted as per Agency's letter of 01/08/01

Major Deficiencies

1. As per our letter of January 8th, 2001, the "Certification with Respect to Citation of Data" form must specify "Cite-All" or "Selective" by placing a check mark in one of the boxes. A revised data matrix form was not included in your submission packet of September 18th, 2001. As you are citing some data, provide a list of the companies you are offering to compensate.
2. A storage and stability study is required as part of the product chemistry submission. This study was not included with your submission packet of September 18th, 2001.

3. A revised, corrected Confidential Statement of Formula must be resubmitted to the Agency for our review. The Confidential Statement of Formula should be given in two parts. The first part or pre-reaction Confidential Statement of Formula should be given in composition of the product with all the active and inert ingredients along with any impurities that may have been formed in the reaction.
4. The names and addresses of all ingredient suppliers must be provided in the pre-reaction Confidential Statement of Formula. Also, the source of [REDACTED] should be provided e.g. [REDACTED], [REDACTED], [REDACTED], etc.
5. Since Hatching Egg claims are considered FDA regulated drug claims, the Agency requests a FDA clearance letter to support these claims that appear on the submitted product labeling. If additional is needed, you should contact Dr. Woodrow Knight at FDA's Center for Veterinary Medicine at (301)-827-0219.

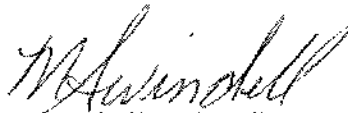
General Comments

Submit efficacy data for food contact surface sanitization to the Agency for our review.

The product labeling has not been conducted yet. Once the efficacy data has been reviewed, the labeling will be also.

Should you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



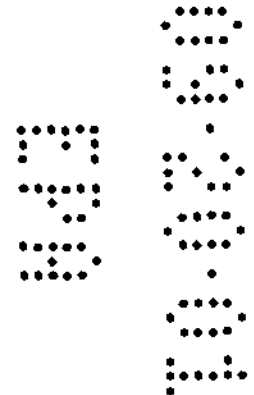
Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510C)

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September 18, 2001

Mr. Marshall Swindell
Environmental Protection Agency
Regulatory Management Branch I
Antimicrobial Division (7510C)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460



SUBJECT: CID 2000
EPA FILE SYMBOL 71355-E

Dear Mr. Swindell:

Please find attached hereto the revised label containing directions for use for hatching eggs for the product listed above per our discussions.

Thank you for your prompt attention.

Respectfully Yours,

Olivia D. Laird
President/Agent

CID 2000[®]

CONCENTRATED SANITIZER FOR HATCHING EGGS

Active Ingredients :

HYDROGEN PEROXIDE

26.5%

PEROXYACETIC ACID

4.9%

Inert ingredients

68.6 %

100.0%

**STRONG OXIDIZING AGENT
KEEP OUT OF REACH OF CHILDREN
DANGER**

APPLICATION :

CID 2000 is a peroxyacetic acid based sanitizer developed for sanitizing of hatching eggs.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN :

Probable mucosal damage may contraindicate the use of gastric lavage.

DIRECTIONS FOR USE :

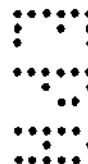
It is a violation of Federal law to use the product in a manner inconsistent with its labelling.

For sanitizing of hatching eggs :

Prepare a solution of CID 2000 by diluting 1.0 ounce CID 2000 with 5 gallons of water. The solution should be equal to or warmer than the eggs, but not exceed 130°F. As eggs are gathered or prior to setting, apply solution as a coarse spray so as to lightly wet all shell surfaces. The solution should not be reused for sanitizing hatching eggs.

NOTE :

This product at its use dilution is compatible with stainless steel and aluminium surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.



STORAGE AND DISPOSAL :

Storage : Store in a cool, dry place in tightly closed container away from children. Keep containers closed when not in use. Keep container out of direct sunlight. Avoid temperatures below 23°F and above 86°F to maintain product quality. Avoid all contaminants, especially dirt, caustic, reducing agents and metals.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discarded, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

EPA Reg. N° : 71355-xx

EPA Est. N° : 71355-BEL-001

BATCH N° : see top / bottom EXPIRY DATE : see top / bottom

Net contents : see top / bottom

Produced by :

CIO LINES NV/SA - Waterpoortstraat 2 - B 8900 IEPER - BELGIUM - EUROPE

Phone: 011-32-57-217877 - Fax: 011-32-57-217879

www.cidlines.be - cidlines@cidlines.be

CID LINES

CID 2000®

CONCENTRATED SANITIZER FOR HATCHING EGGS

Active ingredients :

HYDROGEN PEROXIDE

26.5%

PEROXYACETIC ACID

4.9%

Inert ingredients

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NOTE TO PHYSICIAN :

Probable mucosal damage may contraindicate the use of gastric lavage.

DIRECTIONS FOR USE :

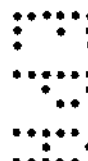
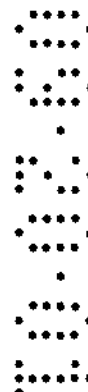
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NOTE :

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STORAGE AND DISPOSAL :

Storage : Store in a cool, dry place in tightly closed container away from children. Keep containers closed when not in use. Keep container out of direct sunlight. Avoid temperatures below 23°F and above 86°F to maintain product quality. Avoid all contaminants, especially dirt, caustic, reducing agents and metals.

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Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damaged are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product

EPA Reg. N° : 71355-xx

EPA Est. N° : 71355-BEL-001

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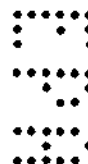
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Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discarded, should be disposed of as hazardous waste to after contacting the appropriate local, state, or Federal agency to determine proper procedures.

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EPA Reg. N° : 71355-xx

EPA Est. N° : 71355-BEL-001

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It is a violation of Federal law to use the product in a manner inconsistent with its labelling.

For sanitizing of hatching eggs :

Prepare a solution of CID 2000 by diluting 1.0 ounce CID 2000 with 5 gallons of water. The solution should be equal to or warmer than the eggs, but not exceed 130°F. As eggs are gathered or prior to setting, apply solution as a coarse spray so as to lightly wet all shell surfaces. The solution should not be reused for sanitizing hatching eggs.

NOTE :

This product at its use dilution is compatible with stainless steel and aluminium surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

STORAGE AND DISPOSAL :

Storage : Store in a cool, dry place in tightly closed container away from children. Keep containers closed when not in use. Keep container out of direct sunlight. Avoid temperatures below 23°F and above 86°F to maintain product quality. Avoid all contaminants, especially dirt, caustic, reducing agents and metals.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discarded, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

Disposal of container : Triple rinse. Then offer for recycling or puncture and dispose in a sanitary landfill. Disposal by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

EPA Reg. N° : 71355-xx

EPA Est. N° : 71355-BEL-001

BATCH N° : see top / bottom EXPIRY DATE : see top / bottom

Net contents : see top / bottom

Produced by :

CID LINES NV/SA - Waterpoortstraat 2 - B 8900 IEPER - BELGIUM - EUROPE

Phone: 011-32-57-217877 - Fax: 011-32-57-217879

www.cidlines.be - cidlines@cidlines.be

CID LINES

CID 2000[®]

CONCENTRATED SANITIZER FOR HATCHING EGGS

Active Ingredients :

HYDROGEN PEROXIDE

26.5%

PEROXYACETIC ACID

4.9%

Inert ingredients

68.6 %

100.0%

**STRONG OXIDIZING AGENT
KEEP OUT OF REACH OF CHILDREN
DANGER**

APPLICATION :

CID 2000 is a peroxyacetic acid based sanitizer developed for sanitizing of hatching eggs.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER, Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Remove contaminated clothing and wash before reuse.

FIRST AID STATEMENTS

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN :

Probable mucosal damage may contraindicate the use of gastric lavage.

DIRECTIONS FOR USE :

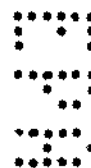
It is a violation of Federal law to use the product in a manner inconsistent with its labelling.

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NOTE :

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STORAGE AND DISPOSAL :

Storage : Store in a cool, dry place in tightly closed container away from children. Keep containers closed when not in use. Keep container out of direct sunlight. Avoid temperatures below 23°F and above 86°F to maintain product quality. Avoid all contaminants, especially dirt, caustic, reducing agents and metals.

Disposal of pesticide : Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representatives at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state, and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies should be contacted by prior to disposal. CID 2000, which is to be discarded, should be disposed of as hazardous waste after contacting the appropriate local, state, or Federal agency to determine proper procedures.

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ENVIRONMENTAL HAZARDS :

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

EPA Reg. N° : 71355-xx

EPA Est. N° : 71355-BEL-001

BATCH N° : see top / bottom EXPIRY DATE : see top / bottom

Net contents : see top / bottom

Produced by :

CID LINES NV/SA - Waterpoortstraat 2 -B 8900 IEPER - BELGIUM - EUROPE

Phone: 011-32-57-217877 - Fax: 011-32-57-217879

www.cidlines.be - cidlines@cidlines.be

CID LINES

SUBMISSION BAR CODE # 5585959REVIEWER K Leavy-Mun KCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 71355-E PM 33 ACTION CODE 188DESCRIPTOR Chemistry Study

[] CHILD RESISTANT PACKAGING: [] CERTIFICATION
[] NON-RESIDENTIAL USE ONLY
[] NOT APPLICABLE

REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL

PROPOSED CLASSIFICATION: [] GENERAL [] RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

08	28	00
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09	12	00
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09	14	00
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METHOD OF SUPPORT

FORMULATORS EXEMPTION

[] CITE-ALL
[] SELECTIVE
[] NOT SUBMITTED
[] NOT APPLICABLE
[] INCORRECT/RESUB

[] SUBMITTED
[] NOT SUBMITTED
[] NOT APPLICABLE
[] INCORRECT/RESUB

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY

EFFICACY

TOXICOLOGY

HED TOX.

ENVIRON. FATE

FISH/WILDLIFE

OTHER

STATUS

RESPONSE CODE

13

RESPONSE DATE

JAN 08 2001

AC
2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 08 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NV CID Lines SA
Waterpoorstraat 2 B 8900 Ieper
Belgium

Attention: Olivia Laird

Subject: CID 2000
EPA File Symbol Number 71355-E
Your Application Dated August 28th, 2000
EPA Received Date September 12th, 2000

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is unacceptable for the following reasons:

ADMINISTRATIVE:

The "Certification with Respect to Citation of Data" form is incomplete. Under the "Method of Support" section of the "Certification with Respect to Citation of Data" form, please specify "Cite-All" or "Selective" by placing a check mark in one of the boxes.

The submitted data matrix is incomplete. The efficacy data must be listed on the data matrix in order to support any efficacy claims that appear on the product labeling. You must also submit a data matrix to support both technical and active ingredients.

CHEMISTRY:

The activator and stabilizer inert ingredients that are typically found in peracetic acid and hydrogen peroxide formulations, such as in the "Mc-Too" [REDACTED] product, were missing in the proposed CID 200 formulation. The Agency requests confirmation whether the formulation indeed uses no activators or stabilizers or whether an omission of these inert ingredients has occurred in both the Confidential Statement of Formula, as submitted, shows [REDACTED] as the supplier of peracetic acid. This is not consistent with the product chemistry data which describes CID Lines.

[REDACTED]

Since CID 2000 is made by an integrated system, its Confidential Statement of Formula should be given in two parts. The first part or pre-reaction Confidential Statement of Formula should show the formula with all of the starting or beginning materials while the second part or post-reaction Confidential Statement of Formula should show the composition of the product with all the active and inert ingredients along with any impurities that may have been formed in the reaction.

The names and addresses of all ingredient suppliers must be provided in the pre-reaction Confidential Statement of Formula. Also, the source of the water should be provided e.g. municipal water, well water, deionized water, etc.

Since CID 2000 is made by an integrated system with non-registered ingredients, a five batch analysis and a storage and stability study is required as part of the product chemistry submission. This data was not provided.

In the discussion of the certified limits for the active ingredients in the chemistry data package, there are significant differences in these limits disclosed in the product chemistry data must support those given in the Confidential Statement of Formula.

However, the upper and lower certified limits for both the active and inert ingredients were acceptable as given in the Confidential Statement of Formula.

The requirements of PR Notice 91-2 were satisfied. The nominal concentration of the active ingredients given in the basic formulation Confidential Statement of Formula agreed with the percentage declared on the product labeling.

All active and inert ingredients utilized in the formula are cleared for use in pesticide formulations.

MINUTES OF THE MEETING:

On December 8th, 2000, Marshall Swindell (PM33) met with Luc Ledox (CID Lines Sales Manager), Helena Brutsaert (CID Lines Export Consultant), Steve Diegnan (Merial Select, US Associate), Olivia Laird (Consultant).

We discussed the claims of the new application referenced above. The company was informed that the label contains a new use pattern: poultry drinking water (for use in drinking water lines). The Agency has an automatic processing time of nine months for this new use.

Residue chemistry, efficacy(modify pool disinfection test protocol), toxicology data; and an FQPA Risk Assessment will be required to support the use pattern.

The company has decided to seek the poultry drinking water use pattern at another time. Currently, the company will seek a non-food contact surface sanitization claim for farm premises. The label will also include a "Hatching Egg Sanitization" claim. The company was provided with a copy of DIS/TSS No. 3, 10, 15 and 18 enclosures. The company was informed that they must do the following:

1. must obtain FDA clearance to support the Hatching Egg Sanitization claim
2. must submit efficacy data to support the non-food contact surface sanitization label claim.
3. must submit five copies of revised product labeling.
4. are substantially similar in composition to the "Me-Too" product referenced on their application form; consequently, CID Lines may use the Cite-All option under the Selective method of support to satisfy their acute toxicity data requirements.

If you have any Questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7505C)

SEP 18 2000

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

CID LINES
C/O OLIVIA D. LAIRD
501 SOUTH LINCOLN AVENUE
STERLING, VA 20164

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 09/12/00. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER

NV CID LINES SA
Waterpoortstraat 2
B 8900 Ieper - Belgium

2. REGULATORY ACTION TO BE TAKEN

Submission for an application for registration
of a Me-Too Product

Product Name: CID 2000

EPA FILE SYMBOL: 71355

3. TRANSMITTAL DATE

August 28, 2000

4. LIST OF SUBMITTED STUDIES

Volume 1. Administrative Materials

45210501 volume 2. CHEMISTRY DATA

Company Official: Luc Ledoux


(signature)

Company Name: CID LINES

Company Contact: Olivia D. Laird, Agent/Submitter
LAIRD'S REGULATORY CONSULTANTS
501 South Lincoln Avenue
Sterling, Virginia 20164-2024

(703) 471-6590
phone

Vol. 2

Product ingredient source information may be entitled to confidential treatment

Inert ingredient information may be entitled to confidential treatment

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States Environmental Protection Agency Washington, DC 20460	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number 268976
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Application for Pesticide - Section I

1. Company/Product Number 71355-E	2. EPA Product Manager Marshall Swindell ✓	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CID 2000	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) NV CID LINES SA Waterpoortstraat 2 8900 Ieper - Belgium <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. [REDACTED] Product Name [REDACTED]	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

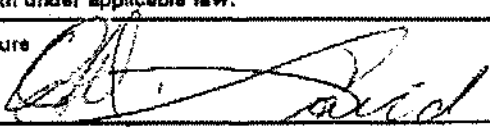
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for registration of a Me-too Product containing Peracetic Acid Hydrogen Peroxide and [REDACTED] along with inert ingredients which are also contained in previously registered products. The Chemistry Data is contained in volume 2 of this package.

Section - III

1. Material This Product Will Be Packaged In:		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1 Gallon	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Olivia D. Laird Laird's Regulatory Consultants, Inc.	Title President/Agent	Telephone No. (Include Area Code) (703) 471-6590
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) 216
2. Signature 	3. Title General Sales Manager	
4. Typed Name Luc Ledoux	5. Date AUGUST 28, 2000	

EPA
12-00

CID 2000



CID 2000 is a peracetic acid-based sanitizer developed for the cleaning and decontamination of drinking water systems for :

1. *broilers and layers*
2. *turkeys*
3. *pigs*

Active ingredients :

Peracetic acid

5 % (by wt)

Hydrogen peroxide

20 %

Inert ingredients

75 %

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No :
EPA Establishment No : 71355-BEL-001

Batch No : see top of bottle
Expiry Date : see top of bottle

MANUFACTURED BY:

CID LINES
THE PROFESSIONAL HYGIENE COMPANY

Waterpoortstraat 2 - B 8900 IEPER
BELGIUM - EUROPE

Phone : 011 32 57 217877 - Fax : 011 32 57 217879

Website : <http://www.cidlines.be> - e-mail : cidlines@cidlines.be

Net contents : 1 gal

EPH

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

9

12-00

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS :

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible, however, at temperatures exceeding 158°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

DIRECTIONS FOR USE :

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

CID 2000 peracetic acid sanitizer is recommended for use in drinking water systems as a cleaning agent of the entire drinking water system (pipelines, nipples, bell-drinkers, ...) between the flocks, and as a drinking water sanitizer during production. CID 2000 is effective against bacteria and fungi and prevents formation of slimes during production.

1. Cleaning of drinking water systems :

Between the flocks : let circulate a 1:50 solution of CID 2000. Use circulation techniques as appropriate to the equipment. All surfaces should be exposed to the sanitizing solution for a period of 4-6 hours. Drain thoroughly and rinse with potable water until clear water comes out of the drinking water system. Repeat treatment as required to maintain control.

2. For acidification and decontamination of the drinking water during production :

Use CID 2000 at a dilution of 1:2500 to 1:3000 during 2 to 3 days a week every other day, or in delicate periods 3 to 4 consecutive days. Use circulation techniques as appropriate to the equipment.

Stop adding CID 2000 24 hours before vaccination and medical treatments.

REMARK :

Use CID 2000 with pumps fully made out of Teflon® (if not possible ; make a 1:100 pre-dilution before passing the pump)

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

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TABLE OF CONTENTS

1. Transmittal Document
2. Application for Registration
3. Letter of Authorization
4. Offer To Pay Statement
5. Copy of CSF
6. Five (5) copies of revised labeling
7. Data Matrix

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number NV CID LINES SA Waterpoortstraat 2, 8900 Ieper - Belgium	EPA Registration Number/File Symbol 71355-
Active Ingredient(s) and/or representative test compound(s) Peracetuc acid, Hydrogen Peroxide and [REDACTED]	Date August 28, 2000
Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) eterinary drinking water equipment sanitizer	Product Name CID 2000

☒ **NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	--

SECTION II: GENERAL OFFER TO PAY

Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Olivia D. Laird

Date

8/28/00

Typed or Printed Name and Title

Olivia D. Laird/Agent 221



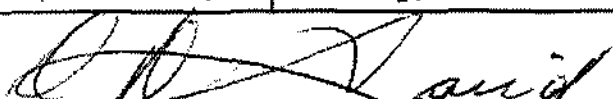
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0055

22

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DATA MATRIX

Date August 28, 2000		EPA Reg No./File Symbol 71355-E		Page 1 of 3	
Applicant's/Registrant's Name & Address NV CID LINES SA, Waterpoortstraat 2, B 8900 Ieper-Belgium		Product CID 2000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
61 - 1 (830.1550)	Product Identity, Composition and Analysis test guidelines	Attached	CID LINES	Own	
61-2 (830.1600-830.1650)	Manufacturing Preprocess Equipment used in process	Enclosed	CID LINES	Own	
62-1 (1830.1700-1830.1750)	Preliminary Analysis			Own	
62-2 (1830.1700-1830.1750)	Certified Limits	Enclosed	CID LINES	Own	
62 - 3(1830.1800)	Enforcement Analytical Method	Enclosed	CID LINES	Own	
63 - 2(830.7302)	Color	Enclosed	CID LINES	Own	
63 - 3(830.6303)	Physical State	Enclosed	CID LINES	Own	
63 - 4(830.6304)	Odor	Enclosed	CID LINES	Own	
63 - 5(830.7200)	Melting Point	N/A			
63 - 6(830.7220)	Boiling Point	Enclosed	CID LINES	Own	
63 - 7(830.7300)	Density/Bulk Density	Enclosed	CID LINES	Own	
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 8/28/2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date		AUGUST 28, 2000		EPA Reg No./File Symbol	71355-E	Page 2 of 3
Applicant's/Registrant's Name & Address				Product		
NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium				CID 2000		
Ingredient Peracetic Acid and Hydrogen Peroxide						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
63 - 8(830.7840	Solubility	N/A				
and 830.7860						
63 - 9(830.7950)	Vapor Pressure	Enclosed	CID LINES	Own		
63 -10(830.7370)	Dissociation Constant	N/A				
63 -11(830.7570)	Octanol/Water Partition Coef.	N/A				
63 - 12(830.7000)	pH	Enclosed	CID LINES	Own		
63 -13(830.6313)	Stability	Enclosed	CID LINES	Own		
63 -14(830.6314)	Oxidizing Reducing Reaction	Enclosed	CID LINES	Own		
63 - 15(830.6315)	Flammability	Enclosed	CID LINES	Own		
63 - 16(830.6316)	Explosibility	Enclosed	CID LINES	Own		
63 - 17(830.6317)	Storage Stability	Enclosed	CID LINES	Own		
63 -18(830.7100)	Viscosity	N/A				
63 -19(830.6319)	Miscibility	Enclosed	CID LINES	Own		
63 - 20(830.6320)	Corrosion Characteristic	NA				
63 -21(830.6321)	Dielectric Breakdown Voltage	N/A				
Signature			Name and Title		Date	
			OLIVIA D. LAIRD, AGENT		9/28/2000	



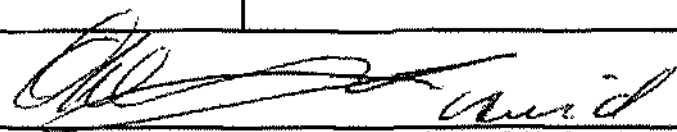
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-006

224

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DATA MATRIX

Date AUGUST 28, 2000		EPA Reg No./File Symbol 71355 -E		Page 3 of 3	
Applicant's/Registrant's Name & Address NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium			Product CID 2000		
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
81 - 1	Acute Oral	CITE-ALL			
81 - 2	Acute Dermal Irritation	CITE-ALL			
81 - 3 (870.1300)	Acute Inhalation Toxicity	CITE-ALL			
81 - 4	Primary Eye Irritation	CITE-ALL			
81 - 6	Dermal Sensitization	CITE-ALL			
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 9/28/2000

CID LINES

PROFESSIONAL HYGIENE

December 17, 1997

ENVIRONMENTAL PROTECTION AGENCY
Regulatory Management Branch
Antimicrobial Division
Registration Division (H7505C)
Office of Pesticide Programs
401 M Street, S.W.
Washington D.C. 20460
U.S.A.

Dear Sir/Madam,

By this letter, I hereby authorize OLIVIA D. LAIRD doing business as

LAIRD'S REGULATORY CONSULTANTS, INC.
501 South Lincol Avenue
Sterling, VA 20164-2024
U.S.A.

To deal with the Environmental Protection Agency in all matters pursuant
to registration matters for our company.

This authorization is effective as of this date and will remain in effect until
further notice.

Sincerely,



Jan-Jeroen De Beucker
Area Sales Manager
CID Lines N.V. - Belgium

CID LINES

NV/SA
Waterpoortstraat 2
8900 IEPER - Belgium
☎ +32(0)57 21 78 77 - Fax +32(0)57 21 78 79
B.T.W. BE 435.921.958

• NV CID LINES
• Waterpoortstraat
• 8900 Ieper
• Belgium
• Tel. (0)57 21 78 77
• Fax (0)57 21 78 79

• CID LINES 225



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Product Chemistry Review of **CID 2000**

DP Barcode: **D269345**
Manufacturing-use []

Reg. No. or File Symbol: **71355-E**
End-use Product [X]

Active Ingredient Composition:

Peracetic acid.....5%

Hydrogen peroxide.....20%

TO: Marshall Swindell PM33

FROM: Alex Traska, Chemist *At* 12/11/00
Product Science Branch, CT Team
Antimicrobials Division (7510C)

THRU: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510C)

THRU: Michele E. Wingfield, Chief *Michele E. Wingfield*
Product Science Branch
Antimicrobials Division (7510 C)

BACKGROUND:

This application for a new product registration, for the subject veterinary water system sanitizer, was submitted by Laird's Regulatory Consultant's, Inc. on behalf of the registrant, CID Lines N.V., Belgium.

The registrant, in this new product registration, has requested an expedited

review of **CID 2000** since the proposed product is similar to [REDACTED] EPA Reg. No. [REDACTED] The [REDACTED] product, [REDACTED] contains [REDACTED]

The following documents were submitted and examined in the chemistry review of this submission: application for a "me-too" product registration dated August 28, 2000, proposed Basic Formulation CSF dated 8/28/00, proposed product label dated 9/12/00 and product chemistry data for GRN 61, 62 and 63. Also examined for this review was the pending jacket file, No. 71355- E, for this product.

FINDINGS:

- 1.The requirements of PR Notice 91-2 were satisfied. The nominal concentration of the active ingredients given in the Basic Formulation CSF agreed with the percentage declared on the label.
- 2.Upper and lower certified limits for both the active and inert ingredients were acceptable as given in the CSF. However, in the discussion of certified limits for the active ingredients in the chemistry data package there are significant differences in these limits versus those given in the CSF. The certified limits disclosed in the product chemistry data must support those given in the CSF.
- 3.All active and inert ingredients utilized in the formula are cleared for use in pesticide formulations.
4. Certain activator and stabilizer inert ingredients that are typically found in peracetic acid and hydrogen peroxide formulations, such as in the "me-too" [REDACTED] product, were missing in the proposed **CID 2000** formulation. Registrant should confirm whether the formulation indeed uses no activators or stabilizers or whether an omission of these inert ingredients had occurred in both the CSF and product chemistry package.
- 5.The Basic Formulation CSF, as submitted, shows [REDACTED] as the supplier of peracetic acid. This is not consistent with the product chemistry data which describes CID Lines, the registrant, as also the manufacturer of peracetic acid. Peracetic acid is described as being made by [REDACTED]

[REDACTED]

6. Since **CID 2000** is made by an integrated system, its CSF should be given in two parts. The first part or pre-reaction CSF should show the formula with all of the starting or beginning materials while the second part or post-reaction CSF should show the composition of the product with all of the active and inert ingredients along with any impurities that may have been formed in the reaction.

7. The names and addresses of all ingredient suppliers must be provided in the pre-reaction CSF. Also the source of the [REDACTED] should be provided e.g. [REDACTED] etc.

8. Since **CID 2000** is made by an integrated system with non-registered ingredients, a five batch analysis and a storage stability study is required as part of the product chemistry submission. This data was not provided.

RECOMMENDATIONS:

This application, for the new product registration of **CID 2000**, is not accepted.

Deficiencies noted under Findings should be corrected and all additional information requested should be provided.

12/11/00 AT

Inert ingredient information may be entitled to confidential treatment

12/11/200

Note to PM

Does the CID 2000 product label require a PR Notice 94-4 statement which the "me too" product [REDACTED] was required to carry on its label ?

Alex Traska



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

09/15/2000

OLIVIA D. LAIRD
LAIRD'S REGULATORY CONSULTANTS, INC.
501 SOUTH LINCOLN AVE.
STERLING VA 201642024

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: CID 2000
COMPANY NAME: LAIRD'S REGULATORY CONSULTANTS
OPP IDENTIFICATION NUMBER: 268976
EPA FILE SYMBOL: 71355-E
EPA RECEIPT DATE: 09/12/2000

SUBJECT: RECEIPT OF APPLICATION FOR A NEW ME-TOO REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new 'me-too' registration and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Marshall Swindell, Product Manager 33, at (703)-308-6230.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. White".

Front End Processing Staff
Information Services Branch
Program Management and Support Division

	United States Environmental Protection Agency Washington, DC 20460	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number <div style="font-size: 1.5em;">268976</div>
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Application for Pesticide - Section I

1. Company/Product Number <div style="font-size: 1.2em;">71355-E</div>	2. EPA Product Manager Marshall Swindell ✓	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CID 2000	PM# <div style="font-size: 1.2em;">33</div>	
5. Name and Address of Applicant (Include ZIP Code) NV CID LINES SA Waterpoortstraat 2 8900 Ieper - Belgium <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. XXXXXXXXXX Product Name XXXXXXXXXX	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
---	---

Explanation: Use additional page(s) if necessary. (For section I and Section II.)


Application for registration of a Me-too Product containing Peracetic Acid Hydrogen Peroxide and XXXXXXXXXX along with inert ingredients which are also contained in previously registered products. The Chemistry Data is contained in volume 2 of this package.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container	<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container				4. Size(s) Retail Container <div style="font-size: 1.2em;">1 Gallon</div>	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product				6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Olivia D. Laird Laird's Regulatory Consultants, Inc.	Title President/Agent	Telephone No. (Include Area Code) (703) 471-6590

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <div style="font-size: 2em;"> (Stamp) AUG 28 2000 </div>
2. Signature 	3. Title General Sales Manager	
4. Typed Name Luc Ledoux	5. Date AUGUST 28, 2000	

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
5. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060

	United States Environmental Protection Agency Washington, DC 20460	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number 268976
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Application for Pesticide - Section I

1. Company/Product Number 71355-E	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CID 2000	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) NV CID LINES SA Waterpoortstraat 2 8900 Ieper - Belgium <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. XXXXXXXXXX Product Name XXXXXXXXXX	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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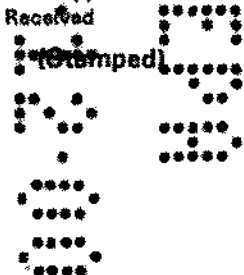
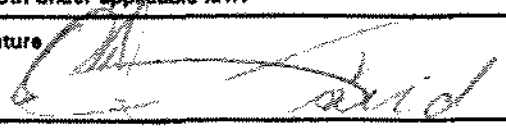
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Application for registration of a Me-too Product containing Peracetic Acid Hydrogen Peroxide and XXXXXXXXXX along with inert ingredients which are also contained in previously registered products. The Chemistry Data is contained in volume 2 of this package.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
<input type="checkbox"/> Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 Gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Olivia D. Laird Laird's Regulatory Consultants, Inc.		Title President/Agent Telephone No. (Include Area Code) (703) 471-6590	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Data Application Received (stamped) 
2. Signature 		3. Title General Sales Manager	
4. Typed Name Luc Ledoux		5. Date AUGUST 28, 2000	

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1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types.
Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "Amend," reregistration, etc.

- 1-5. Self-explanatory.
6. **EPA Use-Only.**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number NV CID LINES SA Waterpoortstraat 2, 8900 Ieper - Belgium	EPA Registration Number/File Symbol 71355-
Active Ingredient(s) and/or representative test compound(s) Peracetuc acid, Hydrogen Peroxide and [REDACTED]	Date August 28, 2000
See Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Veterinary drinking water equipment sanitizer	Product Name CID 2000

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Olivia D. Laird</i>	Date 8/28/00	Typed or Printed Name and Title Olivia D. Laird/Agent 249
-------------------------------------	-----------------	--

PROFESSIONAL HYGIENE

ENVIRONMENTAL PROTECTION AGENCY
Regulatory Management Branch
Antimicrobial Division
Registration Division (H7505C)
Office of Pesticide Programs
401 M Street, S.W.
Washington D.C. 20460
U.S.A.

By this letter, I hereby authorize OLIVIA D. LAIRD doing business as

To deal with the Environmental Protection Agency in all matters pursuant to registration matters for our company.

Sincerely,

CID LINES

NVISA

Waterpoortstraat 2
8900 IEPER - Belgium
☎ +32(0)57 21 78 77 - Fax +32(0)57 21 78 79
B.T.W. BE 435.921.958

• NV CID LINE
 • Waterpoortstr.
 • 8900 Japz
 • Belgium
 • Tel. (02) 32 57
 • Fax (02) 32 5

ENGINES FR

240

EPA

CID 2000



1200

CID 2000 is a peracetic acid-based sanitizer developed for the cleaning and decontamination of drinking water systems for :

1. *broilers and fayers*
2. *turkeys*
3. *pigs*

Active ingredients :

Peracetic acid

5 % (by wt)

Hydrogen peroxide

20 %

Inert ingredients

75 %

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No : 71355-E
EPA Establishment No : 71355-BEL-001

Batch No : see top of bottle
Expiry Date : see top of bottle

MANUFACTURED BY:

CID LINES

THE PROFESSIONAL HYGIENE COMPANY

Waterpoortstraat 2 - B 8900 IEPER

BELGIUM - EUROPE

Phone : 011 32 57 217877 - Fax : 011 32 57 217879

Website : <http://www.cidlines.be> - e-mail : cidlines@cidlines.be

Net contents : 1 gal

EPA

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

1200

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

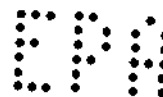
Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

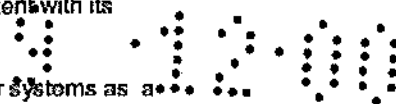
PHYSICAL AND CHEMICAL HAZARDS :

STRONG OXIDIZING AGENT. Corrosive. Mix only with water. Product must be diluted in accordance with label directions prior to use. CID 2000 is not combustible, however, at temperatures exceeding 158°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.



DIRECTIONS FOR USE :

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling



CID 2000 peracetic acid sanitizer is recommended for use in drinking water systems as a cleaning agent of the entire drinking water system (pipelines, nipples, bell-drinkers, ...) between the flocks, and as a drinking water sanitizer during production. CID 2000 is effective against bacteria and fungi and prevents formation of slimes during production.

1. Cleaning of drinking water systems :

Between the flocks : let circulate a 1:50 solution of CID 2000. Use circulation techniques as appropriate to the equipment. All surfaces should be exposed to the sanitizing solution for a period of 4-6 hours. Drain thoroughly and rinse with potable water until clear water comes out of the drinking water system. Repeat treatment as required to maintain control.

2. For acidification and decontamination of the drinking water during production :

Use CID 2000 at a dilution of 1:2500 to 1:3000 during 2 to 3 days a week every other day, or in delicate periods 3 to 4 consecutive days. Use circulation techniques as appropriate to the equipment.

Stop adding CID 2000 24 hours before vaccination and medical treatments.

REMARK :

Use CID 2000 with pumps fully made out of Teflon® (if not possible : make a 1:100 pre-dilution before passing the pump)

LIMITED WARRANTY AND DISCLAIMER :

The manufacturer warrants (a) that this product conforms to the chemical description on the label ; (b) that this product is reasonable fit for the purposes set forth in the directions for use when it is used in accordance with such directions ; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness and of toxicity to laboratory animals. Tests have not been made on all varieties or in all states or under all conditions. The manufacturer neither makes nor intends, nor does it authorize any agent or representative to make, any other warranties, expressed or implied, and it expressly excludes and disclaims all implied warranties or merchantability and fitness for particular purpose. This warranty does not extend to, and the buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

07A

CID 2000

9 12:00

CID 2000 is a peracetic acid-based sanitizer developed for the cleaning and decontamination of drinking water systems for :

1. *broilers and layers*
2. *turkeys*
3. *pigs*

Active Ingredients :

Peracetic acid

5 % (by wt)

Hydrogen peroxide

20 %

Inert ingredients

75 %

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES : Hold eyelids open and flush with a steady, gentle stream of water for 5 minutes. Get medical attention.

IF ON SKIN : Rinse skin immediately with plenty of soap and water for 15-20 minutes. Get medical attention.

IF SWALLOWED : Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No :
EPA Establishment No : 71355-BEL-001

Batch No : see top of bottle
Expiry Date : see top of bottle

MANUFACTURED BY:

CID LINES

THE PROFESSIONAL HYGIENE COMPANY

Waterpoortstraat 2 - B 8900 IEPER

BELGIUM - EUROPE

Phone : 011 32 57 217877 - Fax : 011 32 57 217879

Website : <http://www.cidlines.be> - e-mail : cidlines@cidlines.be

Net contents : 1 gal

EPA

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

9 12:00

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS :

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS :

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DIRECTIONS FOR USE :

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling

CID 2000 peracetic acid sanitizer is recommended for use in drinking water systems as a cleaning agent of the entire drinking water system (pipelines, nipples, bell-drinkers, ...) between the flocks, and as a drinking water sanitizer during production.

CID 2000 is effective against bacteria and fungi and prevents formation of slimes during production.

1. Cleaning of drinking water systems :

Between the flocks : let circulate a 1:50 solution of CID 2000. Use circulation techniques as appropriate to the equipment. All surfaces should be exposed to the sanitizing solution for a period of 4-6 hours. Drain thoroughly and rinse with potable water until clear water comes out of the drinking water system. Repeat treatment as required to maintain control.

2. For acidification and decontamination of the drinking water during production :

Use CID 2000 at a dilution of 1:2500 to 1:3000 during 2 to 3 days a week every other day, or in delicate periods 3 to 4 consecutive days. Use circulation techniques as appropriate to the equipment.

Stop adding CID 2000 24 hours before vaccination and medical treatments.

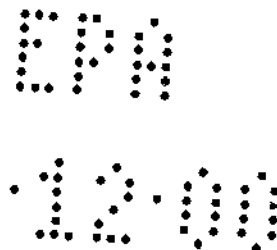
REMARK :

Use CID 2000 with pumps fully made out of Teflon® (if not possible : make a 1:100 pre-dilution before passing the pump)

LIMITED WARRANTY AND DISCLAIMER :

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Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product



EPA

10-00

CID 2000



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1. broilers and layers
2. turkeys
3. pigs

Active Ingredients :

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5 % (by wt)

Hydrogen peroxide

20 %

Inert ingredients

75 %

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

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NOTE TO PHYSICIAN : Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No :

EPA Establishment No : 71355-BEL-001

Batch No : see top of bottle

Expiry Date : see top of bottle

MANUFACTURED BY:

CID LINES

THE PROFESSIONAL HYGIENE COMPANY

Waterpoortstraat 2 - B.8900 IEPER

BELGIUM - EUROPE

Phone : 011 32 57 217877 - Fax : 011 32 57 217879

Website : <http://www.cidlines.be> - e-mail : cidlines@cidlines.be

Net contents : 1 gal

09

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

9

12:00

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapors. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, protective clothing, and rubber gloves when handling. Do not enter an enclosed area without proper respiratory protection.

Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

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LIMITED WARRANTY AND DISCLAIMER :

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Buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages, or injuries resulting from the use or handling of this product, whether or not such liability is based in the contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall manufacturer or seller be liable for special, indirect or consequential damages resulting from the use or handling of this product.

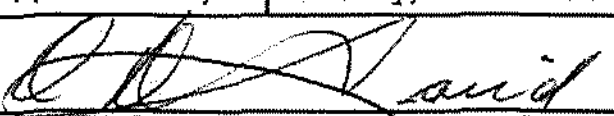


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date August 28, 2000		EPA Reg No./File Symbol 71355-E		Page 1 of 3	
Applicant's/Registrant's Name & Address NV CID LINES SA, Waterpoortstraat 2, B 8900 Ieper-Belgium		Product CID 2000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
61 - 1 (830.1550)	Product Identity, Composition and Analysis test guidelines	Attached	CID LINES	Own	
61-2 (830.1600-830.1650)	Manufacturing Preprocess Equipment used in process	Enclosed	CID LINES	Own	
62-1 (1830.1700-1830.1750)	Preliminary Analysis			Own	
62-2 (1830.1700-1830.1750)	Certified Limits	Enclosed	CID LINES	Own	
62 - 3 (1830.1800)	Enforcement Analytical Method	Enclosed	CID LINES	Own	
63 - 2 (830.7302)	Color	Enclosed	CID LINES	Own	
63 - 3 (830.6303)	Physical State	Enclosed	CID LINES	Own	
63 - 4 (830.6304)	Odor	Enclosed	CID LINES	Own	
63 - 5 (830.7200)	Melting Point	N/A			
63 - 6 (830.7220)	Boiling Point	Enclosed	CID LINES	Own	
63 - 7 (830.7300)	Density/Bulk Density	Enclosed	CID LINES	Own	
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 8/28/2000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date	August 20, 2000	EPA Reg No./File Symbol	71355	Page	3 of 3
Applicant's/Registrant's Name & Address		Product			
AV CID Lines Co, Waterpoortstraat 2, B 8900 Ieper-Belgium		CID 2000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
61 - 1 (630.1550)	Product Identity, Composition and Analysis test guidelines	Attached	CID LINES	Own	
61-1 (630.1600-630.1650)	Manufacturing Process				
	Equipment used in process	Enclosed	CID LINES	Own	
62-1 (1630.1700-1630.1750)	Preliminary Analysis			Own	
62-2 (1630.1700-1630.1750)					
	Certified Limits	Enclosed	CID LINES	Own	
64 - 2 (1630.1800)	Enforcement Analytical Method	Enclosed	CID LINES	Own	
65 - 1 (630.7302)	Color	Enclosed	CID LINES	Own	
65 - 3 (630.6303)	Physical State	Enclosed	CID LINES	Own	
65 - 4 (630.6304)	Odor	Enclosed	CID LINES	Own	
65 - 5 (630.7200)	Melting Point	N/A			
65 - 6 (630.7220)	Boiling Point	Enclosed	CID LINES	Own	
65 - 7 (630.7300)	Density/Bulk Density	Enclosed	CID LINES	Own	
Signature			Name and Title		Date
			OLIVIA D. LAITS, ASST		8/18/2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0050

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DATA MATRIX

Date	August 28, 2000	EPA Reg No./File Symbol	71355	Page	3 of 3
Applicant's/Registrant's Name & Address		Product			
NY CID LINES SA, Waterpoortstraat 2, B 8900 Ieper-Belgium		CID 3000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
61-1 (830.1554)	Product Identity, Composition and Analysis test guidelines	Attached	CID LINES	Own	
61-2 (830.1600-830.1650)	Manufacturing Process				
62-1 (830.1700-1830.1750)	Equipment used in process	Enclosed	CID LINES	Own	
	Preliminary Analysis				
62-2 (1830.1700-1830.1750)				Own	
	Certified Limits	Enclosed	CID LINES	Own	
64-1 (1830.1800)	Enforcement Analytical Method	Enclosed	CID LINES	Own	
64-2 (830.7302)	Color	Enclosed	CID LINES	Own	
64-3 (830.6303)	Physical State	Enclosed	CID LINES	Own	
64-4 (830.6304)	Odor	Enclosed	CID LINES	Own	
64-5 (830.7200)	Melting Point	N/A			
64-6 (830.7220)	Boiling Point	Enclosed	CID LINES	Own	
64-7 (830.7300)	Density/Bulk Density	Enclosed	CID LINES	Own	
Signature		Name and Title		Date	
		OLIVIA D. LAIRD, AGENT		8/30/2000	

INSTRUCTIONS FOR DATA MATRIX

INSTRUCTIONS: Identify all data submitted or cited and all submitters from whom permission has been received or to whom offers to pay have been received by entering sufficient information in the attached matrix (photocopy and attach additional pages as necessary). Complete all columns; omission of essential information will delay approval of the registration/registration. On each page enter the date, Applicant's/Registrant's name, EPA Registration Number or application file symbol of the product, ingredient, page number, and total number of pages.

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Guideline Study Name: For each Guideline Reference Number cited, enter the corresponding Guideline Study Name.

MRID Number: For each individual study cited in support of a Guideline Reference Number and Guideline Study Name, enter the Master Record Identification (MRID) Number listed in the Pesticide Document Management System (PDMS). Enter only one MRID Number on each line. Note that more than one MRID Number may be required per Guideline Reference Number. Note: Occasionally a study required to maintain a registration/registration is not associated with a Guideline Reference Number and Guideline Study Name. In such case, enter the MRID Number(s) for the study(ies).

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PL: The study is in the public literature.

PAY: I have notified in writing the Original Data Submitter or, if the cite-all method is used, all companies listed in the most current Data Submitters List for this ingredient, and have offered (a) to pay compensation in accordance with FIFRA sections 3(c)(1)(F) and/or 3(c)(2)(B), and (b) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study(ies).

GAP: This Guideline data requirement is a data gap as defined in 40 CFR sections 152.83(a) and 152.96.

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Note: If additional explanation is needed, enter a footnote number in this column and attach the corresponding explanation.

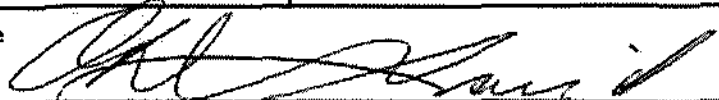


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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WASHINGTON, D.C. 20460

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DATA MATRIX

Date AUGUST 28, 2000		EPA Reg No./File Symbol 71355 - E		Page 2 of 3	
Applicant's/Registrant's Name & Address NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium		Product CID 2000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
63 - 8(830.7840)	Solubility	N/A			
and 830.7860					
63 - 9(830.7950)	Vapor Pressure	Enclosed	CID LINES	Own	
63 -10(830.7370)	Dissociation Constant	N/A			
63 -11(830.7570)	Octanol/Water Partition Coef.	N/A			
63 - 12(830.7000)	pH	Enclosed	CID LINES	Own	
63 -13(830.6313)	Stability	Enclosed	CID LINES	Own	
63 -14(830.6314)	Oxidizing Reducing Reaction	Enclosed	CID LINES	Own	
63 - 15(830.6315)	Flammability	Enclosed	CID LINES	Own	
63 - 16(830.6316)	Explosibility	Enclosed	CID LINES	Own	
63 - 17(830.6317)	Storage Stability	Enclosed	CID LINES	Own	
63 -18(830.7100)	Viscosity	N/A			
63 -19(830.6319)	Miscibility	Enclosed	CID LINES	Own	
63 - 20(830.6320)	Corrosion Characteristic	NA			
63 -21(830.6321)	Dielectric Breakdown Voltage	N/A			
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 9/28/2000



9-12-00

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DATA MATRIX

Date AUGUST 28, 2000		EPA Reg No./File Symbol 71355		Page 2 of 3	
Applicant's/Registrant's Name & Address an CIDLINES bv, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium			Product CID 2000		
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
63 - 8(830.7840)	Solubility	N/A			
and 830.7860					
63 - 9(830.7950)	Vapor Pressure	Enclosed	CID LINES	Own	
63 - 10(830.7570)	Dissociation Constant	N/A			
63 - 11(830.7570)	Octanol/Water Partition Coef.	N/A			
63 - 12(830.7000)	pH	Enclosed	CID LINES	Own	
63 - 13(830.6313)	Stability	Enclosed	CID LINES	Own	
63 - 14(830.6314)	Oxidizing Reducing Reaction	Enclosed	CID LINES	Own	
63 - 15(830.6315)	Flammability	Enclosed	CID LINES	Own	
63 - 16(830.6316)	Explosability	Enclosed	CID LINES	Own	
63 - 17(830.6317)	Storage Stability	Enclosed	CID LINES	Own	
63 - 18(830.7100)	Viscosity	N/A			
63 - 19(830.6319)	Miscibility	Enclosed	CID LINES	Own	
63 - 20(830.6320)	Corrosion Characteristic	NA			
63 - 21(830.6321)	Dielectric Breakdown Voltage	N/A			
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 9/28/2000



9 12:00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date AUGUST 28, 2000		EPA Reg No./File Symbol 71355		Page 2 of 3	
Applicant's/Registrant's Name & Address NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium			Product CID 2000		
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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and 830.7860					
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63 -21(830.6321)	Dielectric Breakdown Voltage	N/A			
Signature 			Name and Title OLIVIA D. LAIRD, AGENT		Date 9/28/2000

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ONITE

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DATA MATRIX

Date **AUGUST 28, 2000**

EPA Reg No./File Symbol **71355 -E**

Page 2 of 2

Applicant's/Registrant's Name & Address

Product

NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium

CID 2000

Ingredient	Peracetic Acid and Hydrogen Peroxide
Water	70.0%
Hydrogen Peroxide	10.0%
Peracetic Acid	20.0%

[illegible]

Signature _____

Name and Title

OLIVIA D. LAIRD, AGENT

Date _____

9/28/2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

[illegible]

Signature 	Name and Title OLIVIA D. LAIRD, AGENT	Date 4/28/2000
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9-12-00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date AUGUST 26, 2000		EPA Reg No./File Symbol 71355 -E		Page 3 of 3	
Applicant's/Registrant's Name & Address NA CIDLINES SA, WATERPOORTSTRAAT 2, B 8900 Ieper- Belgium		Product CID 2000			
Ingredient Peracetic Acid and Hydrogen Peroxide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
81 - 1	Acute Oral	CITE-ALL			
81 - 2	Acute Dermal Irritation	CITE-ALL			
81 - 3(970.1300)	Acute Inhalation Toxicity	CITE-ALL			
81 - 4	Primary Eye Irritation	CITE-ALL			
81 - 6	Dermal Sensitization	CITE-ALL			
Signature 			Name and Title OLIVIA D. LAINE, AGENT		Date 8/28/2000

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U7C

TABLE OF CONTENTS

1. Transmittal Document
2. Application for Registration
3. Letter of Authorization
4. Offer To Pay Statement
5. Copy of CSF
6. Five (5) copies of revised labeling
7. Data Matrix

Olivia D. Laird, President/Owner
Laird's Regulatory Consultants, Inc.
501 South Lincoln Avenue
Sterling, VA 20164-2024

Olivia D. Laird, President/Owner
Laird's Regulatory Consultants, Inc.
501 South Lincoln Avenue
Sterling, VA 20164-2024

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TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER

NV CID LINES SA
Waterpoortstraat 2
B 8900 Ieper - Belgium

2. REGULATORY ACTION TO BE TAKEN

Submission for an application for registration
of a Me-Too Product

Product Name: CID 2000

EPA FILE SYMBOL: 71355

3. TRANSMITTAL DATE

August 28, 2000

4. LIST OF SUBMITTED STUDIES

Volume 1. Administrative Materials

Volume 2. CHEMISTRY DATA

Company Official: Luc Ledoux


(signature)

Company Name: CID LINES

Company Contact: Olivia D. Laird, Agent/Submitter
LAIRD'S REGULATORY CONSULTANTS
501 South Lincoln Avenue
Sterling, Virginia 20164-2024

(703) 471-6590
phone

VOL 1

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